

balanced growth value
respect excellence serve
raise your expectations
commitment diversity

2014 Comerica Sustainability Report

Comerica Bank®

integrity profitability
aring sustainability a life
customer-centricity colla
financial prudence relat

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Sustainability at Comerica



\$975 MILLION

of green loans as of 12/31/14



GRI G4 Sustainability Report
published in 2015



#1
prepaid commercial card
issuer in U.S. in 2014



\$8.8 MILLION

of corporate philanthropic
contributions to organizations
in the communities we serve
in 2014



OVER 32,000

low and moderate income individuals benefiting
from Comerica's financial literacy events in 2014



14 AWARDS

National and Regional 2014
Greenwich Excellence Awards
for Middle Market & Small
Business Banking in 2014

OVER 5,000

colleagues have completed
at least one level in our Masters
of Diversity Awareness program
as of 12/31/14



\$1.7 MILLION

value of employee volunteer time in our
communities for 2014



7,919

employees trained to detect and
prevent elder financial abuse in 2014



\$354 MILLION

of total community and economic
development loans in 2014

Progress on 2020 Environmental Goals vs. 2012 Baseline

**10.3%
REDUCTION**

IN GREENHOUSE GAS
EMISSIONS FROM
REAL ESTATE

as of 2014 vs.
2020 goal of 20%

**22.5%
REDUCTION**

IN WATER
CONSUMPTION

as of 2014 vs.
2020 goal of 30%

**16.9%
REDUCTION**

IN WASTE
TO LANDFILL

as of 2014 vs.
2020 goal of 20%

**18.9%
REDUCTION**

IN OFFICE COPY
PAPER USAGE

as of 2014 vs.
2020 goal of 50%

Visit www.comerica.com/sustainability to view Comerica's 2014 Sustainability Report, including the sources
of data listed above and more information on our sustainability efforts.

Comerica Bank®

Message from our Chairman and CEO



| | |
|---------------------------|--|
| 2014 PROGRESS | Continued progress on our environmental sustainability efforts with further reductions in our energy, waste, water and paper consumption; established 2020 sustainability goals that will help us to make further progress |
| | Creation of our Enterprise Risk Division and strengthened corporate governance processes |
| | Numerous commitments of time and resources to our host communities |
| 2014 CHALLENGES | Cost and complexity of increasing regulatory requirements and impacts on technology needs and resources |
| | Continued low-rate environment leads to additional focus on expense management, which impacts ability to fund additional community investments and corporate efficiency projects |

Seven years ago, we launched our Corporate Sustainability Program to better coordinate sustainability efforts across Comerica and demonstrate responsiveness to our stakeholders. During this time, our progress has been substantial — from putting the proper systems in place to manage and report on our energy use and emissions, to better coordinating our sustainability related risks and opportunities across the organization. Additional examples of our 2014 sustainability accomplishments can be found on the preceding [Infographic](#) page. Nevertheless, we recognize that there is still considerable work to be done. Throughout this report, we will not only highlight the sustainability progress we've made, but also address the ongoing challenges we face as an organization.

For Comerica to be successful, we recognize the importance of supporting vibrant, healthy, and sustainable communities in which our customers and colleagues live, work, and play. Sustainability touches on every aspect of [The Comerica Promise](#) and our Core Values, linkages that are illustrated throughout the report. Quite simply, sustainability is a priority for Comerica, and we demonstrate this through our approach to the broad range of environmental, social, governance, and economic issues and topics that impact our company. Our dedicated colleagues lead this commitment to sustainability by living out our Core Values every day.

In 2014, we set [Environmental Sustainability Goals for 2020](#), and our progress to date has been notable. These goals have enabled us to become more efficient and innovative as we reduce our impacts on the environment. Comerica recognizes that investments in reducing our footprint today can pay dividends far into the future. Furthermore, our leadership team has set a visible example in this space by moving to paperless meetings and generally championing the sustainability mindset in our everyday operations. These performance goals, combined with our transparent reporting and a committed senior leadership team, are expected to help us deliver progress in both the short and medium term.

Looking further ahead, we will continue to use our [Value Creation approach](#), a cornerstone of our program, to embed sustainability practices into our daily operations. By understanding and addressing the sustainability risks and opportunities that present themselves, we can help meet the needs and aspirations of our company and customers on this ever changing planet.

We know we can't do this alone, and in 2014, we engaged a broad group of our stakeholders — including customers, suppliers, investors, community partners, and colleagues — to better understand their sustainability priorities. The culmination of this engagement, our [Impact Assessment](#), has helped us report on those topics most relevant to our business, while sharpening the future focus of our sustainability efforts. This feedback is valuable to our continued progress. We hope that our reporting will help stakeholders see how we are working to address the many competing priorities we face as an organization in light of the ongoing low-rate environment.

I'm pleased with work we have done at Comerica to advance sustainability, and I look forward to the additional progress we will make. As we look back on 2014, we thank all of you who have helped us along the way and look ahead to a more sustainable future.

Thank you.

A handwritten signature in black ink, appearing to read "Ray N. Babbitt".

Chairman and CEO
Comerica Incorporated and Comerica Bank

Comerica Strengths

| Long History | Nimble Size (\$69B in Assets) | Attractive Footprint | Relationship Banking Strategy | Conservative |
|-----------------------|--|--|----------------------------------|---|
| Founded 165 years ago | Products & services of a large bank with a culture of a community bank | Strong presence in Texas, California, and Michigan | Trusted Advisor approach | Strong capital position, weathered credit cycle relatively well |

Key 2014 Recognition

| | |
|--|--|
| 14 national and regional 2014 Greenwich Excellence Awards for Middle Market Banking and Small Business Banking | Corporate Social Responsibility Leadership Award from the Financial Services Roundtable for our work to improve communities and improve Americans' financial literacy skills |
| Ranked #5 among customers and #4 among non-customers in the 2014 <i>American Banker</i> /Reputation Institute survey of bank reputations | <i>DailyWorth's</i> 25 Best Companies to Work for if You are a Woman |
| <i>Global Finance</i> award for Best Regional Bank in the Southwest U.S. | Ranked in <i>LATINO Magazine's</i> 2014 "LATINO 100" list, the second annual listing "of the top 100 companies providing the most opportunities for Latinos" |
| Ranked one of the top U.S. banks in the <i>Newsweek</i> Green Rankings | <i>Hispanic Network Magazine's</i> Best of the Best- Top Supplier Diversity Programs for Hispanics |
| Only U.S. bank listed as a <i>Greenbiz</i> Natural Capital Efficiency Leader | Great Lakes Women's Business Council's Best In Class designation for Supplier Diversity |
| 2nd consecutive listing on CDP's Carbon Performance Leadership Index | Corporation of the Year Nomination by the regional affiliates of the National Minority Supplier Development Council in Michigan, Dallas, and Houston |
| 6th consecutive year on FTSE4Good Index and continued listing on Thomson Reuters Corporate Responsibility Indices | 100 Percent Rating on the Human Rights Campaign 2014 Corporate Equality Index |
| BOMA's Building of the Year (TOBY) Award for renovations at our Michigan Market Headquarters in Detroit | River Rouge School District Appreciation Award for Comerica's continued support and commitment to providing financial literacy to the River Rouge School District |
| <i>Black Enterprise Magazine's</i> 40 Best Companies for Diversity List | Entrepreneurial Spirit Award by Pacific Asian Consortium In Employment in recognition of the bank's leadership in support of microenterprise lending |
| <i>DiversityInc's</i> Top 10 Regional Companies for Diversity | <i>Supply & Demand Chain Executive Magazine's</i> Green Supply Chain Award |

ABOUT THIS REPORT

Comerica's 2014 Corporate Sustainability Report represents our latest broad-based report on the impacts and opportunities associated with our work in the communities we serve. We recognize the interconnected nature of sustainability as it relates to providing the right products and services to meet evolving customer demands and regulatory requirements, while being mindful of minimizing our environmental footprint and maximizing our positive community impacts. This year's report highlights two key themes: our Impact Topics, and **The Comerica Promise** and associated Comerica Core Values.

Impact Topics are those issues most important to our company and to our stakeholders based on extensive engagement work we conducted in 2014-2015. These are explained in detail in the section [Sustainability at Comerica](#). **The Comerica Promise** and our Core Values, presented in [Our Company](#), describe the way we engage with our colleagues, customers, and communities. They are the foundation for the way we do business now and into the future. By looking at sustainability through these two key lenses, we are able to focus on the most critical issues and provide greater transparency into our corporate cultural priorities. As we have in previous reports, we balance our presentation of data by reporting on both progress we have made and challenges we face in key areas.

This report is Comerica's fourth Global Reporting Initiative (GRI)-based Sustainability Report. It covers our sustainability performance from January 1, 2014 to December 31, 2014 (fiscal year 2014). In some instances, 2013 data is included for comparison, as our last comprehensive Sustainability Report was published in 2012. The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2014 Comerica Incorporated Annual Report](#) (herein referred to as 2014 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and, unless otherwise noted, is current as of December 31, 2014. References to the "Board" refer to the Board of Directors of Comerica Incorporated.

We use the internationally-recognized Global Reporting Initiative's (GRI) Sustainability Reporting Guidelines to guide our reporting and track our progress. We produce a biennial GRI-based sustainability report, and a summary environmental progress report in the interim years. Our 2014 report marks a shift from reporting under the GRI G3.1 guidelines to reporting in accordance with the latest GRI G4 standard. As a result, it reflects a heightened focus on those economic, environmental, social, and governance topics viewed by internal and external stakeholders as the most relevant and significant to our business. We have prepared this report in accordance with GRI G4 "Core" option and it includes the General Standard Disclosures as well as Specific Standard Disclosures for the financial services industry, where appropriate. To ease in the shift from GRI G3.1 to GRI-G4, and clarify our performance for readers, we have included both [G3.1](#) and [G4 content](#) indices.

Throughout this report, we use the terms "relevancy," "significance," and "impact" to refer to those topics that reflect the economic, environmental, social, and governance issues most important to Comerica and our stakeholders; what the GRI Sustainability Reporting Guidelines define as "Material Aspects." This is to avoid potential confusion with the terms "material" or "materiality" as defined by or construed in accordance with securities laws or other U.S. legislation, or as used in the context of financial statements and financial reporting.

In addition to GRI, Comerica also acknowledges other sustainability reporting guidelines including those outlined by the Sustainability Accounting Standards Board (SASB) Financials sector standards. While not specifically designed to meet other reporting frameworks, the information presented in this report may address some of the requested disclosures for the SASB Financials sector standards most relevant to our business. Comerica will continue to monitor additional sustainability reporting guidelines for our future sustainability reporting efforts.

We follow the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard (Revised Edition) to account for and calculate Scope 1 and 2 greenhouse gas (GHG) emissions from our operations. In addition, we follow the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard to account for and calculate our Scope 3 GHG emissions. We obtained independent, third-party verification (level: limited assurance) for our Scope 1, Scope 2, and Scope 3 GHG emissions in 2014. A copy of the verification letter and details on Global Warming Potentials (GWP) and emission conversion factors used are included in the [2015 Comerica Incorporated CDP Response](#) (herein referred to as 2015 CDP Response).

Please review this report and share your candid feedback on our sustainability performance. By sharing your thoughts, you can help us to improve our performance and further raise your expectations about what a bank can be. To find out more about sustainability at Comerica or to provide feedback on our reporting, please contact: [J. Scott Beckerman, Senior Vice President and Director of Corporate Sustainability](#), jsbeckerman@comerica.com.

OUR COMPANY

Company Profile

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and is the 22nd largest U.S. financial holding company headquartered in the United States. For over 165 years, our colleagues have focused on building long-term relationships, and helping people and businesses be successful. We deliver the highest quality financial services and are strategically aligned into three business segments:

- **The Business Bank**, supporting companies with an array of credit and non-credit financial products and services
- **The Retail Bank**, delivering personalized financial products and services to small businesses and individuals
- **Wealth Management**, serving the needs of high net worth clients and institutions.

Comerica is located in seven of the 10 largest U.S. cities. Our key markets are Texas, Arizona, California, Florida, and Michigan, with select businesses operating in several other states, Canada, and Mexico. At year end 2014, Comerica served nearly one million customers.

Our total assets stood at approximately \$69.2 billion, total loans (net of unearned income) at approximately \$48.6 billion, and total deposits at approximately \$57.5 billion as of December 31, 2014. Additional financial and non-financial sustainability-related metrics are provided in the [2014 Key Statistics Table](#) attached to this report and in Comerica's [2014 Annual Report](#).

For more information about our company, please visit the [Company Overview](#) section of our website.

Comerica At A Glance: 2014

| | |
|--|--|
| 480 U.S. banking centers (214 in Michigan, 135 in Texas, 104 in California, 18 in Arizona, nine in Florida) and 640 ATMs | Listed on FTSE4Good and Thomson Reuters Corporate Responsibility indices |
| 9,000+ employees | Top five ranking in <i>DiversityInc's</i> Top 10 Regional Companies that Promote a Diverse Workplace |
| Largest U.S. pre-paid commercial card issuer | Ranked among the 25 Best Companies to Work for if You are a Woman, <i>Daily Worth magazine</i> |
| Ranked 27th in <i>The Civic 50</i> survey of America's most community-minded companies | 100 percent rating on the <i>Human Rights Campaign</i> Corporate Equality Index, a national benchmark of LGBT workplace equality |

The Comerica Promise

Comerica's vision is to become the highest performing, most respected, and most desired bank in the communities we serve. Our company's mission is to achieve balanced growth and profitability by delivering a higher level of banking that nurtures lifelong relationships with unwavering integrity and financial prudence.

In late 2013, we launched **The Comerica Promise**, an employee roadmap aligned with our vision and mission, to elevate the way we work with our customers and each other. **The Comerica Promise** includes a Customer Promise and a Colleague Promise — statements that describe the behavioral principles and values that define our culture and align with our code of conduct policy. Comerica's seven Core Values are instrumental to fulfilling this promise. The following figure defines how we live our Core Values and how our customers benefit from our actions.

| How we will act | <i>Our Core Values</i> | How customers will benefit |
|--|----------------------------|---|
| Our decisions will be based first and foremost on what is best for our customers, be they internal or external. | <i>Customer-centricity</i> | An exceptional experience that exceeds their expectations |
| We will work as a team to do what is right by our customers and our colleagues. | <i>Collaboration</i> | A seamless relationship that brings the right resources to meeting their specific financial needs |
| We will maintain the highest ethical standards through our honesty and transparency. We will honor our commitments and take personal responsibility for our actions. | <i>Integrity</i> | A loyal and mutually beneficial banking relationship based on enduring trust |
| We understand there are no trade-offs or short cuts on the road to success. We will strive for greatness through continuous self-improvement. | <i>Excellence</i> | The highest customer satisfaction ratings in the financial services industry |
| We aspire to become a company that fully embraces innovation as a means of driving ongoing growth and prosperity. We remain flexible and adaptable to change. | <i>Agility</i> | New solutions that meet their evolving financial needs |
| We will create an environment that celebrates the differences among our colleagues and customers, with the understanding that such differences make us a stronger company. | <i>Diversity</i> | Appreciation and respect for EVERY customer |
| We embrace our critical role in the communities we serve and acknowledge that our success is intertwined with theirs. We will make sustainability a priority. | <i>Involvement</i> | Affinity for the local causes and priorities that matter most to them |

Throughout this report, we demonstrate how **The Comerica Promise** and our Core Values of **Customer-centricity, Collaboration, Integrity, Excellence, Agility, Diversity, and Involvement** are integrated into our approach to Sustainability and assist us in addressing Impact Topics as well as GRI Indicators.

SUSTAINABILITY AT COMERICA

Comerica views corporate sustainability as an approach to conducting business in a manner that meets our current needs without compromising the ability of future generations to meet theirs. In pursuing this approach, we define "sustainability" as including interconnected environmental, economic, social, and governance topics.



"We understand that if we are to have vibrant communities in which to live, work, and play we must take a holistic view to responsibly managing our corporate sustainability efforts."

- J. Scott Beckerman, Senior Vice President and Director of Corporate Sustainability, Comerica Incorporated

Approach to Sustainability

Comerica's overall approach has remained largely constant since launching our sustainability program in 2008. Our efforts are led by the Corporate Sustainability Office that reports annually to Comerica's Board of Directors (Board) through its Enterprise Risk Committee. Our Sustainability Council, comprised of senior managers from across the organization, develops and implements yearly Sustainability Action Plans, which direct our progress across a broad range of relevant topics. We implement sustainability programs and initiatives using a value creation approach focused on our workplace, workforce, processes, products and services, and governance.

We recognize that we don't operate in a vacuum and that our interactions with stakeholders are a critical part of delivering sustainable value. Our approach to value creation relies on stakeholder input and, therefore, we had significant dialogue with our stakeholders, including customers, investors, employees, and suppliers in 2014.

Building Sustainable Value: Our Priorities

We work to build sustainable value for our company and stakeholders by focusing on the following efforts:

- Training our colleagues to help spur innovation within our operations,
- Seeking opportunities to support customers with diverse and sustainable financial solutions,
- Reducing risks and costs associated with material consumption and greenhouse gas emissions, and
- Maintaining our license to operate, and enhancing our brand by considering our stakeholders' perspectives and "walking the talk" as a responsible corporate citizen.

Despite the prolonged difficult low interest rate environment, our value creation approach has delivered significant impacts over time. Examples of our progress for 2014 are listed on our [Infographic](#) in the front of this report.



2020 Environmental Sustainability Goals

As detailed in our [2013 Comerica Sustainability Progress Report](#), we achieved our first greenhouse gas (GHG) reduction goal in 2013 of reducing our legacy real estate emissions 15 percent by 2014 compared to a 2008 baseline. In 2014, after having achieved our first goal one year early, we developed new and expanded environmental sustainability goals, which were formally launched on Earth Day 2015. In addition to a goal for GHG emissions reduction, we have included new goal categories around waste, water, and paper.

By 2020, Comerica plans to further shrink our operational environmental footprint by achieving the following goals against a 2012 baseline:



- 50%** reduction in office copy **Paper** consumption
- 30%** reduction in **Water** use
- 20%** reduction in greenhouse gas **Emissions**
- 20%** reduction in **Waste** sent to landfill

The new GHG emissions goal covers our Scope 1 and Scope 2 real estate emissions. In developing the goal, we evaluated current science-based goal setting methodologies, in addition to our corporate strategies. While these goal setting practices are still developing, we believe our new goal is generally in line with the science-based targets required for limiting global climate change. We will continue to review our approach to achieving these reductions in light of evolving scientific methodologies. For more information on our goal progress, please see [Managing Operational Impacts](#).

Stakeholder Engagement and Impact Assessment

Understanding and engaging with the broad range of stakeholders is critical to our long-term success as a responsible financial institution. By communicating with and listening to our stakeholders, we can strengthen our business performance and build enduring sustainable value.

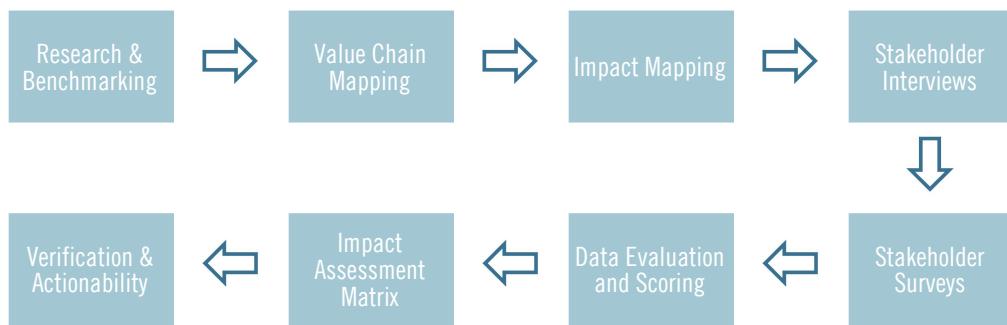
We have reported on the relative importance of significant economic, environmental, social, and governance issues to our business and stakeholders since our inaugural sustainability report in 2008 and began conducting formal stakeholder engagement on sustainability in 2010. In fall 2014, we launched our third round of formal engagement, gaining feedback from a diverse group of stakeholders (shown below) on our sustainability performance. Our goal was to evaluate "materiality" as used in the GRI sustainability context (what we refer to as "relevancy," "significance," and "impact"), and to guide preparation of this publication, our first GRI-G4 based report.

In addition to our engagement around sustainability, we regularly engage with a broad cross-section of stakeholders. The following table shows the types of engagement methods we use in addition to our biennial sustainability engagements.

| Stakeholder Group | How We Engage |
|--|--|
| <i>Colleagues</i> | Intranet communications, Sustainability Council, Green Office Teams, individual meetings |
| <i>Customers</i> | Individual meetings, surveys, online communities, customer appreciation events |
| <i>Environmental, Social, & Governance (ESG) Non-Governmental Organizations (NGOs)</i> | Individual meetings, surveys, professional organizations |
| <i>ESG Rating & Ranking Organizations</i> | Individual meetings, surveys, professional organizations |
| <i>Impact Investors</i> | Individual meetings, investor conferences/presentations, quarterly earnings call |
| <i>Industry</i> | Industry organizations, professional organizations |
| <i>Investors/Analysts</i> | Individual meetings, regular updates, investor conferences/presentations |
| <i>Media</i> | Individual meetings, regular presentations |
| <i>Peers</i> | Industry organizations, professional organizations, individual meetings |
| <i>Suppliers</i> | Regular reviews, surveys, individual meetings |

Impact Assessment Process

In order to create our Impact Matrix, our impact assessment process began with research and limited benchmarking of other financial services companies to identify current approaches and potential best practices. Business leaders from across the company contributed to a value chain map charting our organizational structure and stakeholder interactions. To match significant topics with their impact on the value chain, an impact map was developed. We then conducted extensive one-on-one stakeholder interviews to identify topics of high importance to them. The Impact Topics were identified as those topics that were mentioned at a higher frequency during our stakeholder discussions. To gauge the relative importance of the Impact Topics and to rank relative risks and opportunities, we also conducted a stakeholder survey. To produce our Impact Assessment Matrix we evaluated and scored the interview and survey data gathered along with relevant internal and external policies and priority statements. Finally, senior business leaders from across our organization reviewed the topics and verified their actionability, culminating in Comerica's Impact Matrix.



Stakeholder interviews conducted as part of this process provided feedback that has been used to focus and prioritize our report content, as well as to influence future sustainability priorities. Examples of key topics of interest to our stakeholders follow.

| Stakeholder Group | Example Topics of Interest to Stakeholder |
|---|---|
| <i>Colleagues</i> | Strategy, communications, performance vs. goals, innovation, economic environment, serving customer needs |
| <i>Customers</i> | Financial education & knowledge sharing on broad variety of topics, partnering with community organizations, cybersecurity |
| <i>ESG NGOs</i> | Improved banking access, financial education, customer engagement strategies on ESG issues, transparency in policies/communications |
| <i>ESG Rating & Ranking Organizations</i> | Engaging the value chain, moving from disclosure to action, focus on diversity, climate change, stranded assets, impact investing, responsible lending, investor communication on ESG |
| <i>Impact Investors</i> | Transparency, stranded assets, climate change issues |
| <i>Industry</i> | Green lending, aligning financial services to client aspirations, natural capital, supply chain |
| <i>Investors/Analysts</i> | Financial performance, long-term strategies, transparency, cybersecurity |
| <i>Media</i> | Supply chain, financial performance, climate change, ESG goals |
| <i>Peers</i> | Demand for ESG transparency, common approaches to industry ESG issues, impact of regulations, innovation, supply chain |
| <i>Suppliers</i> | Technology & innovation, common ground on sustainability, cost/beyond basic metrics, partnerships, efficiency |

Impact Topics and Boundaries

As part of our value chain and impact mapping process, we determined aspect boundaries for each of our significant sustainability topics through our initial research and stakeholder interviews. Those key economic, environmental, social, and governance topics most relevant and significant to internal and external stakeholders are defined as Impact Topics. These Impact Topics were matched with the applicable GRI Aspects. Boundaries of the Impact Topics and GRI Aspects were established based on feedback from internal and external stakeholders. The resulting process shaped our reporting content and addresses the issues of relevancy, stakeholder inclusiveness, sustainability context, and completeness under GRI's G4 Guidelines. The following tables depict the boundaries for the Impact Topics, with the relevant boundaries shaded in the corresponding color:

| Economic Impact Topics | Relevant GRI Aspect(s) | Boundary | | | | | |
|---------------------------|--|----------|--------------------------------|-----------|-----------|------------|-----------|
| | | Comerica | Communities in our Key Markets | Customers | Investors | Regulators | Suppliers |
| Financial Performance | Economic Performance | | | | | | |
| Credit Risk | | | | | | | |
| Environmental Risk | Indirect Economic Impacts | | | | | | |
| Economic Environment | Social Product Responsibility: Product Portfolio | | | | | | |
| Indirect Economic Impacts | | | | | | | |

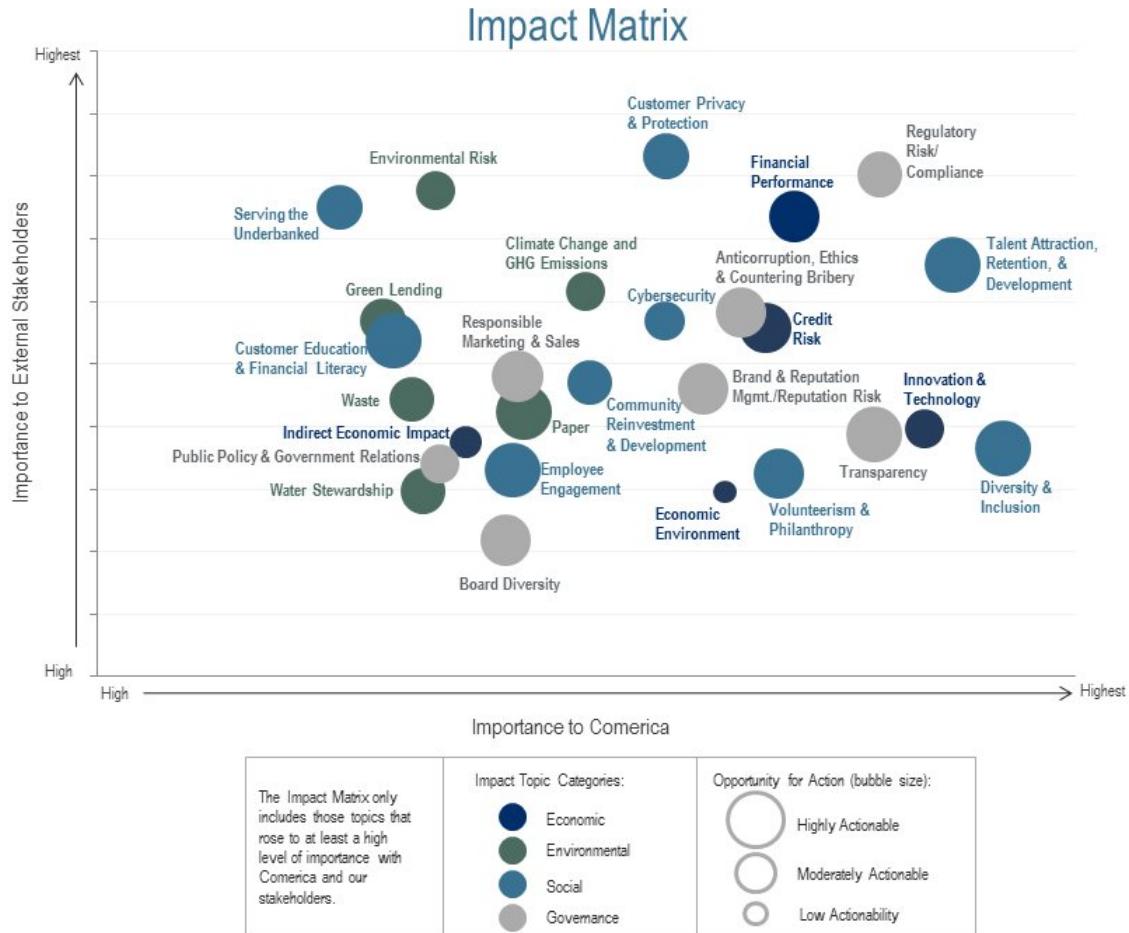
| Environmental Impact Topics | Relevant GRI Aspect(s) | Boundary | | | | | |
|---------------------------------------|--|----------|--------------------------------|-----------|-----------|------------|-----------|
| | | Comerica | Communities in our Key Markets | Customers | Investors | Regulators | Suppliers |
| | Energy | | | | | | |
| Climate Change, Energy, GHG Emissions | Emissions | | | | | | |
| | Compliance | | | | | | |
| | Transport | | | | | | |
| Green Lending | Social Product Responsibility: Product Portfolio | | | | | | |
| Paper | Materials (e.g., Paper) | | | | | | |
| Waste | Effluents and Waste | | | | | | |
| Water Stewardship | Water | | | | | | |
| Environmental Risk | Social/Product Responsibility: Product Portfolio | | | | | | |
| | Social/Product Responsibility: Audit | | | | | | |

| Social Impact Topics | Relevant GRI Aspect(s) | Boundary | | | | | |
|---|--|----------|--------------------------------|-----------|-----------|------------|-----------|
| | | Comerica | Communities in our Key Markets | Customers | Investors | Regulators | Suppliers |
| Talent Attraction, Retention, & Development | Employment | | | | | | |
| | Training and Education | | | | | | |
| | Equal Remuneration for Women and Men | | | | | | |
| Diversity & Inclusion | Diversity and Equal Opportunity | | | | | | |
| Employee Engagement | Labor/ Management Relations | | | | | | |
| | Labor Practices Grievance Mechanisms | | | | | | |
| Customer Privacy & Protection | Customer Privacy | | | | | | |
| Cybersecurity | | | | | | | |
| Serving the Underbanked | Local Communities Indirect economic impacts | | | | | | |
| Volunteerism & Philanthropy | | | | | | | |
| Community Reinvestment & Development | | | | | | | |
| Customer Education & Financial Literacy | | | | | | | |

| Governance Impact Topics | Relevant GRI Aspect(s) | Boundary | | | | | |
|--|---|----------|--------------------------------|-----------|-----------|------------|-----------|
| | | Comerica | Communities in our Key Markets | Customers | Investors | Regulators | Suppliers |
| Anti-corruption, Ethics, & Countering Bribery | Anti-corruption Anti-competitive behavior | | | | | | |
| Public Policy & Government Relations | Public Policy | | | | | | |
| Regulatory Risk/Compliance | Compliance: environment, society, product responsibility | | | | | | |
| Transparency | | | | | | | |
| Brand & Reputation Management/ Reputation Risk | Ethics and Integrity | | | | | | |
| Board Diversity | Diversity and Equal Opportunity | | | | | | |
| Innovation & Technology | Local Communities Customer Privacy | | | | | | |
| Responsible Marketing & Sales | Anti-competitive behavior | | | | | | |
| | Product and Service Labeling | | | | | | |
| | Marketing Communications | | | | | | |

Our Impact Matrix

This comprehensive new Impact Matrix will help shape and focus our sustainability efforts moving forward. It provides a more detailed understanding of the relative significance of sustainability issues that most affect our business and our stakeholders, as well as a focus on those topics over which we can have the greatest influence.



The Impact Matrix will act as a guide both in communicating our progress on these topics, and in further aligning our corporate priorities with the sustainability issues most relevant to our business. Future initiatives and progress on impact topics will be a priority for Comerica's Sustainability Council.

ECONOMIC IMPACT

Impact Topic Financial Performance

Our ability to deliver value to our customers and shareholders alike is what has sustained Comerica in business for over 165 years. It comes as no surprise that our financial performance is viewed as one of the most significant sustainability topics according to our stakeholder impact assessment process. In many respects, our day-to-day operations are closely linked to our sustainability efforts through our focus on ethics, good governance, and responsible business practices. In 2014, we remained focused on our goal of providing a higher level of banking to our customers by serving as their trusted advisor and delivering an exceptional customer experience that exceeds expectations.

| | |
|-----------------|--|
| 2014 PROGRESS | Loan, deposit and earnings growth |
| | Solid expense control |
| | Return to shareholders |
| 2014 CHALLENGES | Prolonged low-rate environment |
| | Increasing scope of regulations |
| | Increasing required investment in technology |

Comerica's strengths as a bank of choice for customers and investors, including highlights of our 2014 financial performance are summarized below. For more financial information, see the [Key Statistics Table](#) and our [2014 Annual Report](#).

Annual Financial Performance Highlights through December 31, 2014

| | |
|--|---|
| <i>Grew the Bottom Line</i> | 11% increase in EPS to \$3.16 |
| | 10% increase in net income to \$593M |
| <i>Focus on Relationships</i> | 5%, or \$2.2B, increase in average loans to \$46.6B |
| | 6%, or \$3.1B, increase in average deposits to \$54.8B |
| | \$5MM increase in customer-driven fee income |
| <i>Controlling What We Can Control</i> | 6%, of \$96MM, decrease in noninterest expenses(1) |
| | 5 bps of NCOs - Credit quality continued to be strong |
| <i>Shareholder Return</i> | 66% of net income, or \$392MM, returned to shareholders (2) |
| | 6% increase in tangible book value per share to \$37.72 |
| | Capital position continued to be solid |

1) Reflecting decreases of \$48MM in litigation-related expenses and \$47MM in pension expense. 2) Through dividends and equity repurchase program.

Impact Topic Economic Environment

The economic environment in which we do business has a significant influence on Comerica's success and long-term sustainability. Yet, unlike many other issues that affect our company, we have little ability to influence the overall state of the economy in our operating regions. Instead, we succeed by understanding the environment, the challenges it presents, and how our customers are impacted, so that we can manage our operations effectively and provide products and services customers need to be successful.

During 2014, we focused on the activities we could control, including growing loans and deposits, and managing expenses as we made necessary investments to meet the increasing regulatory and technology requirements of our industry. While the U.S. economy has seen many challenges in recent years, 2014 finished with an improving outlook for job growth, as well as business and consumer confidence.

Sustainability Highlight: Informing Stakeholders

By passing on insights on the financial and economic environment, we can add value to what we deliver for our customers, investors, and other stakeholders. Knowing this, we regularly share our [Comerica Economic Insights blog](#) on national, regional, and local economic topics with customers and other stakeholders.

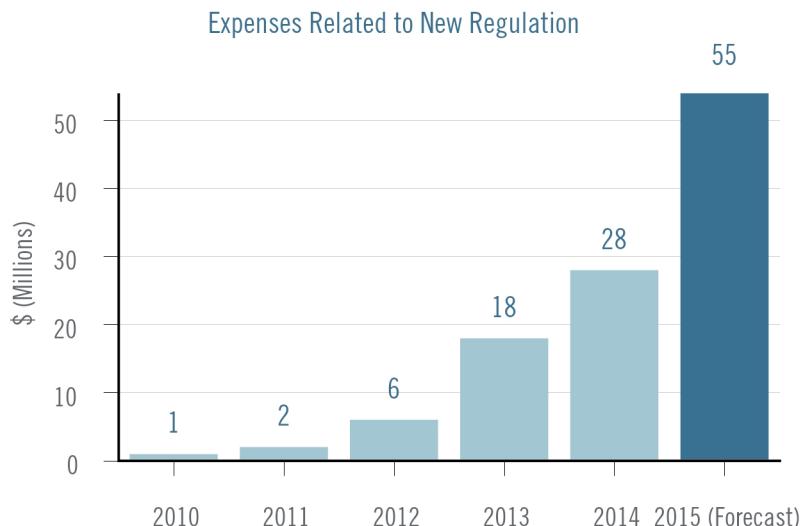


“By sharing our perspectives and knowledge, we help our customers understand the current economic environment, both from a national and local perspective.”

- Robert A. Dye, Senior Vice President and Chief Economist

Increased Regulatory and Technology Demands

In addition to the challenging economic environment, Comerica, along with the rest of the financial services industry, faces increased regulatory and technology demands. In 2014, the cost of complying with new regulations resulted in roughly \$28 million in expenses. We forecast that by 2015, our expenses related to new regulation will have increased 110% compared to 2010. We will continue to add staff and invest in technology for regulatory-related projects such as capital planning, stress testing, enterprise risk, and the Liquidity Coverage Ratio (LCR).



At the same time, our industry faces an expanded array of cybersecurity threats, which require ongoing investments in information and data security. Such investments enable our customers to better protect themselves and allow Comerica to better detect sophisticated attempts to penetrate our defenses. Additional information on cybersecurity can be found in the [Customer Protection and Cybersecurity](#) section of this report.

Our recent investments in technology bring benefits for our business by helping to improve data quality, deepen insights into customer demands, and provide for greater overall efficiency. In addition, technology is becoming increasingly important for executing our business strategy as customers grow more comfortable with online means of accessing their accounts and conducting routine banking transactions.

Future Outlook

Despite the headwinds facing our company and industry, we believe Comerica's long-term approach to delivering value has positioned us well for the future. Through 2015 and beyond, we believe Comerica's relationship banking strategy, combined with our diverse geographic footprint, should continue enabling us to build long-term shareholder value. The graphic below summarizes our ongoing approach and outlook.

| Our Business Approach and Outlook | |
|-------------------------------------|--|
| <i>Growing Loans and Fee Income</i> | Positioned for faster growing markets and industries Focus on cross-sell to drive fee income |
| <i>Controlling Expenses</i> | Continued tight expense control partially offsetting headwinds |
| <i>Maintaining Asset Quality</i> | Weathered current cycle well relative to peers |
| <i>Managing Capital</i> | Strong capital base; Estimated Basel III Tier 1 common capital: 10.3% Continued share buyback; Increased dividend in 2Q14 |
| <i>Positioned for Rising Rates</i> | 200 bps increase in rates expected to result in >10% increase in net interest income (1) |

1) Analysis based on non-parallel gradual increase in interest rates over 12 months; For methodology see the Company's Form 10Q, as filed with the SEC. Data as of 9/30/14.

While there are moves we could make to enhance our short-term results, these would come at a cost to our long-term performance. They would also entail consequences for our customers, colleagues, and other stakeholders that do not align with our vision to become the highest performing, most respected and most desired bank in the markets we serve.



“At Comerica, we deliver returns for our investors by living our Core Values. We are unwilling to compromise our strategy to impact short-term metrics at the expense of long-term value.”

- Karen L. Parkhill, Vice Chairman and Chief Financial Officer, Comerica Incorporated

Impact Topic Indirect Economic Impact

As a financial services company, there are numerous economic impacts resulting from our business operations and the flow of money between Comerica and our customers and suppliers. The following are examples of positive indirect economic impacts associated with our business activities and links to additional information:

- Community economic development activity (see [Community Reinvestment and Development](#))
- Products and services to serve the underbanked (see [Improving Banking Access & Serving the Underbanked](#))
- Economic impacts created by our loans (see [Economic Impact, Supporting Environmentally Beneficial Companies](#))
- Employee volunteerism and non-profit board service (see [Volunteerism](#))
- Supply chain spend (see [Supply Chain](#))

Small businesses are at the center of local economies in which we operate. With over 125,000 small business customers, the positive economic impacts from these relationships strengthen our local communities.

Changes in our real estate footprint have potential indirect economic impacts on our communities. However, for 2014, our overall reduction of occupied square footage was approximately 1.2 percent, which is not expected to have a significant negative economic impact on the associated communities.

Sustainability Highlight: Comerica's Commitment to Detroit in 2014

Comerica's commitment to Detroit can be traced to our roots over 165 years ago and is evident in our \$1 million pledge to help the City of Detroit emerge from bankruptcy, support city pensioners and protect the Detroit Institute of Art's collection as part of the "Grand Bargain."

| | | |
|---|---|---|
| <i>More than \$1 billion in consumer and commercial loans in Detroit</i> | <i>#1 ranking shared for the most banking centers in Detroit, with 23 locations</i> | <i>1,100 employees - the largest bank employer in Detroit</i> |
| <i>More than \$2 million in community contributions and volunteer labor hours in Detroit</i> | <i>30-year agreement in naming Comerica Park, a jewel in Detroit's revitalization</i> | <i>13,000 volunteer hours in support of Detroit community activities</i> |
| <i>Almost \$1.4 million in support from colleagues and Comerica to the United Way of Southeast Michigan</i> | <i>More than \$15 million in Detroit community development loans</i> | <i>Almost \$1.8 million in support of the Downtown Detroit Partnership since 1996</i> |



“Detroit really is where it all started for Comerica. We continue to build on that foundation, providing over one billion dollars in consumer and commercial loans to Detroit residents and businesses last year, and supporting the city’s nonprofit organizations through our charitable contributions and the volunteer efforts of our colleagues.”

- Michael T. Ritchie, President, Michigan Market, Comerica Bank

GOVERNANCE AND ETHICS

Comerica's tradition of relationship banking and reputation for **Integrity**, dating back more than 165 years, are what makes our business successful. We follow our Core Values in our daily interactions with customers and clients, and maintain high standards of ethics and accountability for our Board, executives, and colleagues.

Our commitment to strong governance permeates every level of our company, with the Governance, Compensation and Nominating Committee of the Board of Directors overseeing corporate governance. For additional information on Comerica's governance philosophy, standards, and expectations, see our [Corporate Governance Guidelines](#).

| | |
|-----------------|---|
| 2014 PROGRESS | Creation of our Enterprise Risk Division |
| | Strengthened corporate governance processes |
| | Updated executive compensation practices based on stakeholder feedback |
| 2014 CHALLENGES | Cost and complexity of complying with Dodd-Frank Wall Street Reform and Consumer Protection Act |
| | Managing credit risks in a highly competitive marketplace |
| | Maintaining impactful transparency communication channels for diverse stakeholders needs |

Impact Topic Transparency

Providing robust disclosures of financial, environmental, and social metrics is a tenet of our corporate responsibility reporting. In our ongoing [work with stakeholders](#), transparency is viewed as one of the most significant environmental, social, and governance (ESG) topics for our business. Transparent disclosure helps to instill confidence and trust in our company, and we are committed not only to transparent disclosure of information, but also to having the systems in place to obtain and verify the information stakeholders want to access.

Comerica makes extensive information on the company publicly available through our [website](#), investor presentations, and [press releases](#), as well as compliance with numerous disclosure obligations, such as those found in our [SEC filings](#) and other regulatory filings. Our commitment to publishing biennial sustainability reports using the GRI framework fosters ESG transparency, including identifying the most significant issues, successes, and challenges for our business, consistent with the GRI G4 methodology.

Our Transparency Impacts

| Economic Transparency | Environmental Transparency | Social Transparency | Governance Transparency |
|--|--|---|---|
| Allows investors to better evaluate our performance and provides balanced disclosures in response to the rapidly evolving regulatory landscape | Disclosures provide evidence of our commitments and progress, while public goals and targets help drive performance and assist us in meeting our commitments | Shows responsiveness to stakeholder inquiries, and enhances business relationships with diverse customers | Increases stakeholder confidence and strengthens business performance |

Corporate Governance

Strong corporate governance and the trust of our customers and other stakeholders are the foundations upon which our company is built. Our commitment to sound corporate governance practices centers on our [Code of Business Conduct and Ethics for Employees](#), which guides the behavior of our colleagues. In addition, we have codes of ethics for both [Comerica's Board of Directors](#) and [Senior Financial Officers](#).

Comerica's Board of Directors is responsible for oversight and overall direction of our business. To strengthen the Board's independence and autonomous oversight, as well as its communication and effectiveness, an independent Facilitating Director is elected annually by non-management directors. Comerica regularly reassesses its governance practices and makes changes when appropriate. In recent years, we have implemented several key updates in line with best practice, including the following:

- Strengthened the role of the independent Facilitating Director who participates in preparing meeting agendas and schedules, and presides over executive Board sessions
- Adopted a majority vote standard for director elections
- Eliminated supermajority voting requirements in our governing documents
- Declassified our Board to allow for the annual election of all directors
- Prohibited transactions by employees and directors designed to hedge or offset any decrease in the market value of Comerica's equity securities

Our three main committees of Comerica's Board (Audit, Enterprise Risk, and Governance, Compensation and Nominating) have generally remained consistent in their function since our previous 2012 Comerica Sustainability Report. Comerica's Sustainability Director provides annual updates to the Board's Enterprise Risk Committee, which reviews our value creation approach to corporate sustainability including areas of progress, challenges, and future initiatives.

Impact Topic **Board Diversity**

Comerica strives to have a diverse Board that reflects our customer base. The Governance, Compensation and Nominating Committee takes diversity into account in assessing potential director nominees, for example, by seeking nominees with a broad range of experience, professions, skills, geographic representation, and/or backgrounds. Nominees are not discriminated against on the basis of race, religion, national origin, sexual orientation, disability, or any other basis as proscribed by law.

Our [Corporate Governance Guidelines](#) outline the Board's evaluation process, which includes an annual self-evaluation of the full Board and its committees focused on areas for improvement. In 2014, seven of Comerica's directors were male and two were female. One director is Hispanic and one is African American (seven are Caucasian), while eight of the nine Board members are independent. One director represented the 30-50 age range, while the rest were over 50 years old.

Investor Relations

Comerica seeks to communicate with our investors in a way that conveys our story effectively while meeting their informational needs and applicable securities regulations. This outreach is integral to our business practices, as shareholders provide valuable insight on operations, governance, compensation, and other key topics. In addition to discussion of strategic industry issues and Comerica's performance, we receive frequent feedback from investors on various issues at conferences, during roadshows, and during investor visits to our corporate headquarters.

Based on feedback from our 2013 shareholder outreach, the Governance, Compensation and Nominating Committee, along with management, undertook an extensive review of our executive compensation programs. Significant design changes were put into place with the following shareholder-driven goals:

Compensation Program Objectives

| | | | | |
|--|---|--|--|--|
| Ensuring each program's transparency for participants and shareholders | Maintaining alignment with shareholders | Increasing the rigor of performance criteria | Retaining aspects of the prior programs that were effective and familiar to participants | Responding to regulatory expectations (in particular, ensuring our compensation programs do not incent excessive risk) |
|--|---|--|--|--|

Following these important changes, approximately 88 percent of shareholders voted in support of our 2014 "Say On Pay" proposal.

During 2014, we reached out for feedback to Comerica's top 30 shareholders (who hold over 55 percent of our shares), as well as several additional shareholders who expressed an interest in dialogue. Generally, shareholders were supportive of the revisions to our compensation structure. Both the Governance, Compensation and Nominating Committee and senior management conducted thorough reviews of the new programs. They were comfortable that the current programs meet our objectives to ensure that compensation programs demonstrate a strong pay for performance linkage, reflect good governance, and are consistent with appropriate industry practices. No further significant changes were made in 2014.

Executive Compensation

Outstanding leadership is critical to success in our highly competitive industry. At Comerica, we use our executive compensation programs to align the interests of executive officers with those of our shareholders. Our programs are designed to attract, retain, and motivate the company's leaders to sustain our competitive advantage, and to provide a framework that encourages outstanding financial results and shareholder returns over the long-term.

As indicated above, we undertook an extensive review of our compensation programs in 2013, based on investor feedback and coupled with evolving regulatory requirements. As a result, we introduced significant changes to executive compensation in 2014, including:

- Implementing a new three-year performance share program where payouts are contingent on meeting specific prospective financial goals that can be modified by relative total shareholder return performance
- Eliminating duplicate metrics in both our short- and long-term incentive programs
- Restructuring the short-term cash incentive program to measure absolute (actual) performance as opposed to relative (compared to our peers) performance
- Updating the funding scale for the long-term cash incentive program to more clearly align pay with performance
- Adopting a forfeiture provision applicable to awards granted in 2014 or later that allows unvested equity awards to be canceled in the event of an adverse risk outcome
- Revising stock ownership guidelines to increase the amount of shares the CEO must own from five times base salary to six times base salary

Our sustainability agenda is also reflected in our executive compensation to promote progress and high level leadership. Each member of our executive team has specific annual diversity goals which are tied to their performance, and climate and energy performance are reflected in compensation for executives with line of business responsibility in these areas. Also, the incentive compensation of the Chief Financial Officer, who is the executive sponsor of Comerica's Corporate Sustainability Program, is tied to performance and execution of our sustainability strategy.

Risk Management

Risk management has always been a priority at Comerica. Today, it is more important than ever given the pace of change in the business world, slow growing economy, rapidly evolving regulatory expectations, and highly competitive business environment. Our consistent and conservative

approach to banking has fostered a robust risk culture at Comerica. This makes us strong and resilient, benefiting our stakeholders and our business.

Our culture and approach is not to eliminate risk, but to understand, manage, and receive the appropriate consideration for the risks we elect to accept. Consideration includes income to our company in line with our corporate strategy, mission, and Core Values.

The 2008 financial crisis emphasized the fact that risk management needed increased attention across the financial services industry. In order to manage risk more effectively at Comerica, we enhanced our focus towards a more comprehensive enterprise risk strategy applied to the whole company.

Progress

In 2014, we restructured the organization of our risk management teams by creating a corporate Enterprise Risk Division. The Enterprise Risk Division provides centralized oversight, challenge, and guidance to business unit risk owners across the organization related to their risk management practices. This team of experts provides consistent processes for how our business units identify, measure and manage existing and emerging risks, and ensure alignment of risk practices across the bank. The Chief Risk Officer, who manages the Enterprise Risk Division and chairs the Enterprise-Wide Risk Management Committee, reports to the Chief Executive Officer and to the Enterprise Risk Committee of the Board. The colleagues in our Enterprise Risk Division continually review Comerica's risk policies and risk management initiatives.

We also strengthened our enterprise risk framework in 2014. The framework lays out a common platform on which all risks and mitigating controls can be evaluated to allow for aggregation of granular risks across the organization and to achieve a broader understanding of our corporate risk profile. Comerica's Risk Appetite Statement also supports this framework by identifying the level of risk the organization is willing to accept as we implement the tactical plans that will allow us to achieve our strategic goals and objectives. Every individual at Comerica has a role in managing risk to help achieve our strategic goals and deliver on **The Comerica Promise**.

Evaluating our Performance

The effectiveness of our risk management framework is evaluated through audits, examinations by our regulators (federal and state), self-assessments, and benchmarking. For some areas of Comerica, limits and targets are in place which are used to evaluate the performance of these approaches. The Federal Reserve (our primary regulator) and our internal and external audit teams regularly and extensively review our processes and identify deficiencies.

Twice a year, we conduct a stress testing process that includes significant identified risks to our company. For the latest results, see our [website](#). For more on risk identification and management see our latest [2014 Annual Report](#).



“We understand there is risk in nearly everything we do. To achieve Comerica’s long-term strategic objectives while striving to earn a sufficient shareholder return, we must accept some level of risk. Our enterprise-wide approach to understanding and managing risks builds on our history of proactive risk management and enhances our overall performance.”

- Michael H. Michalak, Executive Vice President and Chief Risk Officer, Comerica Incorporated

Impact Topic Credit Risk

Managing credit risk is a critical aspect of the relationship with our customers to whom we extend credit and provide other financial products. Comerica employs many tools and subject matter experts with numerous years of experience to manage credit risks. Relevant colleagues undergo formal training in credit analysis and underwriting, and in doing business, we follow a broad collection of approved credit policies and guidelines that are intended to limit risk and provide portfolio diversification.

Comerica's Strategic Credit Committee, chaired by our Chief Credit Officer, has ultimate oversight of credit risk, supported by multiple subcommittees with various approval authorities, depending on the type of deal, level of financial commitment, credit risk rating, and customer type. The Strategic Credit Committee takes into consideration portfolio risk analysis, our risk appetite, and the corporate strategy to determine that appropriate policies are in place to evaluate and mitigate potential losses. In addition to standard policies, there are also some policies specific to select industries, collateral types or other specialties. Ongoing review by credit committees and adherence to credit policies results in sound risk management practices, which dynamically address areas of concern as they emerge and which proactively implement steps to mitigate risks.

Impact Topic Environmental Risk

Environmental risk is an increasingly relevant and high profile issue for the private sector. For Comerica, such risk includes a broad array of operational and business issues, including the environmental impact associated both with our own operations and those of our customers. Our efforts to reduce environmental risks focus on our real estate-based commercial lending and on environmental sustainability impacts from our operations.

Environmental Risk Management

Managing environmental risk limits the economic, regulatory, and reputational risks associated with taking real estate as collateral in a loan transaction. Comerica follows the Federal Reserve System and Federal Deposit Insurance Corporation guidelines requiring lending institutions to have policies and procedures in place to manage environmental risk. We have long maintained policies and procedures for managing the environmental credit risks related to the loans we provide customers in addition to the environmental risks and compliance obligations associated with the properties we operate.

Comerica's Environmental Risk Management (ERM) Group, based in our corporate Credit Department, manages risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate, and minimize potential environmental risks to our business associated with loans secured by real estate.

We expect compliance with environmental laws that are covered in our lending agreements. We monitor for environmental compliance when loans are originated and, in some instances, depending on the individual credit risk profile, when loans are renewed. In some cases, we require follow-up assessments with borrowers and make agreements that establish specific outcomes and deadlines.

Our Environmental Liability Policy requires that properties that are pledged as collateral must be evaluated for potential significant environmental liabilities using standard and proprietary due diligence tools. Throughout this process, our loan officers work with customers and seek guidance as needed from Comerica's ERM Group. The policy applies to real estate-secured loans (excluding one-to-four family residential properties), and requires environmental due diligence under the following circumstances:

- When we finance a new loan
- When we consider taking title to a property due to a loan default
- When we refinance an existing loan under a range of circumstances, including when the loan amount is increasing and a property has a high potential environmental risk.

Most property loan-related environmental due diligence reports are referred to the ERM Group for expert review. In 2014, the team evaluated 588 sites associated with loans totaling approximately \$7 billion.

ERM Group members collaborate with our legal and environmental consulting partners on best practices for managing current and emerging environmental risk issues. They also provide leadership in environmental organizations, including:

| | | | |
|---|--|---|--|
| Environmental Bankers Association (EBA) | Association for Redevelopment Initiatives (formerly National Brownfield Association) | Michigan Banker's Association Environmental Affairs Committee | Michigan Department of Environmental Quality (MDEQ) Collaborative Stakeholder Groups |
|---|--|---|--|

Sustainability Highlight: Using modern remote technology to assess decades old environmental concerns

In some scenarios, evaluating potential risks will require that we consider unconventional assessment methods, as was the case when a suburban Detroit business owner sought a loan to finance a restaurant and specialty beverage store. The customer was able to provide existing, but dated, environmental studies of the property that were done before the site was converted to its current use. Review of these historic documents revealed a portion of the property was a former electric power plant used for the community's trolley system in the early 1900s. Additionally, there were concerns regarding the presence of an adjacent gas station and the associated underground storage tanks.



Comerica's ERM team was able to review previous subsurface investigations of the area and the state's online database to determine significant contamination was unlikely. To update the previous reports, a virtual site visit was conducted of the interior and exterior of the building using online mapping systems. The combination of modern technology and historical site evaluations quickly and cost-effectively provided the risk management data needed for Comerica to be comfortable with the environmental risk associated with the property and thus approve the loan. (Photo credit: Google & Bing)

Performance

In 2014, ERM took several steps to strengthen risk management. These included:

- Implementing a Centrally Managed Services (CMS) protocol to reduce the probability of adverse impacts,
- Strengthening vendor relationship management processes to ensure our business arrangements with service providers do not present unwarranted risks, and
- Updating procedural guidelines to reflect evolving environmental due diligence standards.

The team provided ongoing training for loan groups in our core markets. Comerica also conducted internal and intra-department environmental risk audits during the year with no significant adverse outcomes.

Social Risks

Social risk issues are inherently covered in Comerica's credit risk assessment process by getting to know our customers, their businesses, and their industries, as we strive to be their trusted advisor. Transactions are reviewed on a case by case basis, and our relationship managers may elect not to pursue or continue a relationship based on social risk issues. We do not currently follow a formal procedure for enterprise-wide screening of our social risks in our portfolio; however, Comerica may elect not to finance certain industries we view as having an unacceptable level of social risk.

Environmental Sustainability and Climate Risk

Risks associated with the impacts of our operations are generally managed through the Corporate Sustainability Office in close partnership with Corporate Real Estate, Procurement, and other internal business units. Risks associated with the operational impacts of our business include greenhouse gas (GHG) emissions, water use, and waste generation, as well as the procurement of the goods and services needed to operate our business. Our Corporate Sustainability Office evaluates and manages these risks in **Collaboration** with the business units mainly responsible for a given issue, such as Corporate Real Estate or Procurement. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight.

In managing GHG emissions from our operations, Comerica recognizes the uncertainty inherent in predicting the specific impacts of a changing climate. While Comerica does not at this time employ a precautionary approach to environmental issues, we do seek to limit our operational GHG emissions where practical and cost effective. We use our value creation approach to sustainability to manage the risks and opportunities for our company and our customers presented by a changing climate.

Having met our original GHG reduction goal of 15 percent a year early, we set new environmental sustainability goals in 2014 to be met by 2020, which include a 20 percent reduction in GHG emissions. For more information on additional environmental goals, see the [Environment](#) section of this report. Also, for more information on how we address climate-related risks and opportunities, see our [2015 CDP Response](#).

Economic Environment Risk

Comerica is directly affected by the behavior of the markets in which we operate, the state of the wider U.S. economy, and related impacts on our customers and our own business lines (see [Economic Impact](#)). While we have little ability to influence the broader economic environment on our own, we can and do actively manage the associated risks to our company. We use ongoing stress testing and sensitivity testing to maintain a deep understanding of how changes in the economic environment may impact our company. Our close relationships with customers, including a deep understanding of their business needs, coupled with Comerica's strong leadership and conservative approach to business, positions us well to weather difficult economic environments.

Impact Topic Regulatory Risk/ Compliance

Managing regulatory risk and complying with associated federal and state regulations is central to our commitment to operate as a responsible business, and critical to maintaining our reputation for [Integrity](#). We strive to always do business within the laws and regulations that govern our operations.

We help ensure compliance across our business activities by requiring our colleagues to complete in-depth training programs and to follow our [Code of Business Conduct and Ethics for Employees](#). Managers also use monitoring tools to capture potential cases of violation or non-compliance by employees, which are immediately escalated for urgent investigation and resolution. For more information, see the Responsible Marketing & Sales section of [Responsible Business Practices](#).

Impact Topic Brand & Reputation Management/Reputation Risk

With consumers increasingly interested in doing business with companies they admire and trust, reputational risk is an increasing concern for business. Such risks include compliance issues, operational challenges, or a strategic, high profile event. Our business is based on the trust of our customers, communities, and entire value chain, which makes managing reputational risk extremely important.

Our leadership team actively oversees potential risks to our reputation, and our rigorous monitoring processes guard against incidents related to compliance, operational risk, and social and environmental risks. For more information, see [Sustainability at Comerica](#).

Business Ethics

At Comerica, we work hard at helping people and businesses to be successful, working within the values that guide our company. In order to remain one of the leading financial institutions in the United States, we strive to instill trust and confidence in our customers, colleagues, shareholders, and business partners by demonstrating the highest standards of ethics and [Integrity](#) on a daily basis.

Impact Topic Anti-Corruption, Ethics, & Countering Bribery

Our Codes of Conduct

A key tool for instilling an ethical culture at Comerica, and ensuring our compliance with related laws and regulations, is our [Code of Business Conduct and Ethics for Employees](#), as discussed in [Corporate Governance](#). The employee Code supports [The Comerica Promise](#) and provides

detailed guidance on issues including ethical business practices, fair dealing, maintaining professional relationships, avoiding conflicts of interest, and reporting illegal or unethical behavior and related retaliatory actions. In 2014, we strengthened the Code's provisions dealing with confidentiality.

The honesty, integrity, and sound judgment of the Chief Executive Officer and senior financial officers is fundamental to the reputation and success of Comerica. Accordingly, we have a [Senior Financial Officer Code of Ethics](#). To assist in fostering a culture of openness and accountability, Comerica Board members are subject to our [Code of Business Conduct and Ethics for Members of the Board of Directors](#).

Reporting Concerns

To report concerns, we have established two anonymous, confidential hotlines for colleagues that are operated through a third party vendor. One hotline is used to report human resources (HR) issues such as workplace harassment or safety, while the other is to report accounting or audit-related issues. We use a variety of communication channels, including training and our intranet site, to remind colleagues of the importance of reporting conduct that may violate the law or our employee code of conduct to their manager, HR consultant, or the hotlines. Additional information regarding the hotlines is provided in the [Employee Engagement](#) section.

Colleagues complete an annual, mandatory online training module on the Code of Business Conduct and Ethics for Employees, which emphasizes personal accountability for complying with its provisions. In 2014, 99.9 percent of active employees completed the training.

Countering Corruption

Money laundering, bribery, and corruption also present significant potential risks to Comerica, including regulatory scrutiny, as well as business and reputational harm. Countering the potential for such activity is a top priority. Comerica's Bank Secrecy Act/Anti-Money Laundering risk assessment program takes into account risk factors such as customer geography and demographic information, as well as whether we interact with customers face-to-face or through online banking. Certain lines of business and product offerings carry inherently more risk of corruption.

Our rigorous Anti Money Laundering (AML) Compliance program deploys systems and controls to monitor customer and business unit risks, and implements additional controls and/or quality assurance reviews when specific risks are identified. In 2014, we further strengthened our safeguards by implementing a policy regarding the use of virtual currency products by our customers.

Our business units undergo annual risk assessments to test the effectiveness of their individual compliance risk controls, including those for new products and vendors. We use the results from internal audits, internal investigations, and monitoring systems to assess the effectiveness of our corporate compliance program. External regulatory examinations, and changes to governmental guidance, are also useful tools in identifying ways to enhance our compliance program.

Fraud Resolution

Comerica investigated 349 reported internal incidents of allegedly corrupt behavior in 2014. Of these, 275 were categorized as unfounded or inconclusive, including cases that were determined as no fraud or no dishonest act, or where the employee voluntarily resigned or previously resigned. In 74 cases, allegations were substantiated and/or the employees admitted their involvement; in those cases, Comerica took corrective action, and we terminated employees for violating bank policy, where appropriate. Each case was dealt with on an individual basis, resulting in single incidents being counted multiple times when several people were involved. During 2014, there were no cases involving contracts that were not renewed due to corrupt vendors, and no legal cases were brought against Comerica or its employees for corruption.

Ethics Training

Comerica colleagues are required to complete frequent regulatory and other ethics or human rights-related training, in most cases, annually. Compulsory training programs are in place for our Code of Business Conduct and Ethics for Employees, Information Privacy and Protection, Anti-Money Laundering, and Diversity as well as for a one-time Sustainability training. Our 2014 performance follows.

By the Numbers: Mandatory Employee Training in 2014

| Compliance, Diversity, and Sustainability Training Topics | Total Hours | Percent of Relevant Employees Who Completed Required Training in 2014 |
|---|-------------|---|
| Comerica Code of Business Conduct & Ethics for Employees | 5,033 | 99.9% |
| Fair Lending / Anti-Discrimination | 7,521 | 99.9% |
| Anti-Money Laundering | 3,720 | 99.9% |
| Information Privacy and Protection | 4,992 | 100.0% |
| Community Reinvestment Act | 3,777 | 99.9% |
| Financial Abuse of Elderly and Vulnerable Adults | 3,627 | 99.9% |
| Workplace Harassment | 749 | 100.0% |
| Diversity | 3,727 | 87.2% |
| Sustainability | 399 | 99.9% |

Human Rights

Respect for human rights is critical to our business approach, and we work to provide a diverse, inclusive, safe, and ethical workplace. We do so by enforcing our employee [Code of Business Conduct and Ethics for Employees](#), equal employment opportunity statements, and safety and health policies while maintaining a zero tolerance approach for workplace corruption, discrimination, or harassment. Comerica's [Equal Employment Opportunity \(EEO\) Statement](#) has been updated to include sexual orientation and gender identity.

We also look to promote human rights and progress with our stakeholders, including beyond our own operations. For example, we work with customers, suppliers, and communities to encourage equal opportunity, fair lending, privacy protection, and economic and social development. In our standard agreement with suppliers and contractors, we require that they act in compliance with applicable laws, including those on equal employment opportunity, employment practices, immigration, and data protection. We also require suppliers to abide by our non-discrimination and diversity practices.

Comerica primarily does business in the United States and has no significant presence or investment in countries where protecting human rights is a known problem. Accordingly, we do not screen investments or suppliers specifically for human rights issues. For additional information on our supply chain, please see the [Supply Chain](#) section of this report.

Impact Topic Public Policy & Government Relations

Financial services are heavily regulated in the United States, and Comerica closely monitors and engages in the development of public policies that directly affect our business and industry. With government legislation and regulation posing potentially significant impacts for our company, we owe it to our stakeholders to stay actively involved in the public policy process.

Our advocacy efforts are focused mainly at the federal level and in our key market states: Texas, Arizona, California, Florida, and Michigan. At times, our executives hold direct discussions with elected officials and engage with national and state banking industry associations. These associations include the American Bankers Association, The Clearing House, Financial Services Roundtable, Consumer Bankers Association, Texas Bankers Association, California Bankers Association, Michigan Bankers Association, Arizona Bankers Association, and Florida Bankers Association. We work with these associations to advocate on behalf of the banking industry, and specifically regional banks, targeting legislation or regulation that aims to impact the commercial or consumer financial products and services we offer.

In 2014, the primary public policy challenge Comerica faced was the cost and complexity of the enhanced prudential standards resulting from the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA). Our main advocacy goal is working with Congress to amend the DFA to allow for tiered regulation of banks based on complexity and risk, rather than just size.

With respect to public policy for environmental and climate change issues, we annually review all organizations where Comerica colleagues have a board level role. Where an organization's policies and positions appear to conflict with our corporate climate and sustainability strategy, we hold follow-up discussions with relevant board member colleagues. In 2014, we did not identify any such conflict situations.

Political Contributions

One way Comerica participates in the political process is through contributions from its political action committee (PAC). The PAC annually solicits contributions from eligible employees and makes bipartisan contributions — all in compliance with local, state and federal election laws — to political candidates and committees who understand and support Comerica's pro-banking, pro-business philosophy. All political contributions and guidelines are developed and approved by a separate PAC Board comprised of senior executives from across the company's major business segments.

Comerica does not use corporate funds to make direct political contributions to candidates for public office or groups organized to influence political campaigns under Section 527 of the Internal Revenue Code. From time to time, however, Comerica will contribute corporate funds to support state and local ballot initiatives if the company believes that passage of such initiatives will enhance the quality of life in the communities where our customers and employees live, work and raise their families.

During the 2013-2014 election cycle, the Comerica PAC contributed \$571,060 to political candidates and committees. We do not make soft-money or in-kind political contributions, or use corporate funds to make direct political contributions to candidates for public office or groups organized to influence political campaigns.

For our contributions between November 1, 2013, and November 4, 2014, please see the [Political Activities and Contributions](#) section of our website, which is updated annually.

RESPONSIBLE BUSINESS PRACTICES

Living our Core Values of **Excellence**, **Customer-Centricity**, and **Integrity** means we seek to deliver the highest customer experience — one that consistently exceeds expectations and delivers superior satisfaction while providing a mutually beneficial banking relationship based on enduring trust. To maintain this trust, we provide our customers with responsible banking products and services that meet their needs, protect their personal information, provide secure means of conducting business, and help improve banking access in the diverse communities we serve. As a trusted advisor to our customers, our inclusive approach seeks to serve all portions of the communities we serve with banking products and services that enhance overall financial well-being.

| | |
|-----------------|---|
| 2014 PROGRESS | Ongoing investments in cybersecurity |
| | Enhancements to our mobile banking environments |
| | Growing our efforts to reach diverse customers through Market Segmentation teams |
| 2014 CHALLENGES | Impact on financial performance from continued low-rate environment has limited product development |
| | Ongoing challenges by outside forces on customer privacy and cybersecurity |
| | Balancing customer needs between traditional and innovative delivery of banking products and services |

Impact Topics

Customer Privacy & Protection Cybersecurity

Our responsibility to our customers starts with safeguarding their privacy and financial information. Increasingly, this involves investing in cybersecurity measures to prevent unauthorized access to our electronic systems. Our customers expect and trust us to maintain their privacy and keep their financial information secure. To deliver on this commitment, we continually evaluate our security systems and technology to safeguard customer information, protect against fraud attempts, and provide the highest level of safety and protection. Challenges we face include the constantly evolving nature of security technology, a growing number of attempts to compromise our customers' privacy, and the different methods being used by the perpetrators. We participate in a number of initiatives to keep us abreast of new fraud trends and share this intelligence with our colleagues, customers, and community members, as appropriate.

Our latest [stakeholder engagement](#) exercise revealed that customer privacy and protection — defined as securing customer data, confidentiality, and physical safety — is the single most important issue for our external stakeholders. Cybersecurity also emerged as a key related topic critical to our business success. Failure to properly manage these issues can result in significant risks to Comerica, including financial losses, reputational risk, and fines or penalties due to non-compliance. Accordingly, these topics are managed and discussed together in this section. For further discussion of these risks, see Item 1A in our [2014 Annual Report](#).

Customer information protection and privacy, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Corporate Information Protection Program. The tables below shows the program's key components and its goals for protecting our customers and the company.

| Corporate Information Protection Program Components | | |
|---|-----------------------|---------------------|
| Strategy and Governance | Risk Management | Controls training |
| Monitoring and Testing | Response and Recovery | Program Maintenance |
| Corporate Information Protection Program Goals | | |
| <ul style="list-style-type: none">• Protect valuable information and information technology resources• Ensure the security and confidentiality of customer records and corporate information• Protect against unauthorized access to or use of such records• Detect, prevent and mitigate identity theft in connection with covered accounts• Provide security protections that are consistent with the value of the information asset• Protect the legal position of the company• Ensure compliance with regulatory guidelines for protecting information assets | | |

We evaluate the program's effectiveness through risk control self-assessments conducted by business units, as well as by audits and examinations conducted by our internal audit team and external regulatory examiners. The Enterprise Risk Committee of Comerica's Board of Directors oversees and assesses the program's overall status, the effectiveness of policies and procedures, material risk issues, risk management and control decisions, and service provider oversight. The committee also reviews management responses to security incidents, including those involving identity theft or personal health information, and recommendations for program changes.

We continue to enhance our policies and programs in this fast evolving arena, based on multiple considerations. These include Comerica's enterprise risk management strategy, regulatory requirements, changing technology infrastructure, data quality, and the evolving threat environment. Examples of the kinds of action we take to enhance customer protection and privacy include role-based access management for employees, denial of service protections, adaptive authentication for web-facing customer applications, and technology lifecycle management.

While we work diligently to protect our customers' information and privacy, we also work to give our customers the tools they need to help protect themselves through educational content at [Comerica's Fraud Center](#) on our website. Please click on the following tabs for more information:

| | | | |
|-------------------------------------|---|---|---|
| How to Report Fraud | Common Types of Fraud and Email Scams | Ways to Protect Against Fraud | Computer Safety & Cybersecurity |
|-------------------------------------|---|---|---|

Progress in 2014

We require colleagues to take online Information Privacy and Protection training annually, and we update the program every year. In 2014, over 99 percent of colleagues completed the training, whose key topics included information security, privacy, identity theft, Code of Business Conduct and Ethics for Employees, and records management.

We also engaged with the Consumer Financial Protection Bureau in an effort to identify additional processes and opportunities to protect our customers' information. In 2014, our colleagues reported 130 situations where a customer's personal information was disclosed to a third party without the customer's consent. Errors are reported when customers notify our employees or when employees realize an error has occurred before or without affected customers being notified. Most often, these incidents involved a deposit to, or withdrawal from, an incorrect account or the mailing or emailing of information to the wrong person. In 2014, Comerica was not subject to fines or non-monetary sanctions for non-compliance with personal protection data laws, and regulators did not identify breaches of customer information by our company that would have a material adverse effect on our operations or ability to perform the services we offer.

Information Lifecycle Management

An important aspect of protecting customer information and privacy is the management and confidentiality of such information throughout its lifecycle. Comerica's Information Lifecycle Management Policy actively manages our corporate information to prevent unauthorized access, modification, disclosure, or destruction. In 2014, 100 percent of required colleagues completed annual training on managing information through its lifecycle. We also perform audits and compliance checks on our Secure Destruction Program for managing paper documents and electronic equipment, which complements our recycling efforts (See [Environment-Waste](#) section).

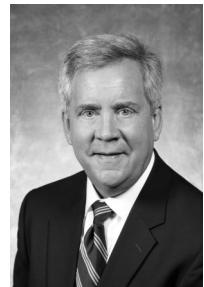
Sustainability Highlight: Comerica Shred Day Achieves Second GUINNESS WORLD RECORDS® Honor



In 2014, our Texas market earned a second **GUINNESS WORLD RECORDS** certificate for the most paper collected and securely destroyed in a 24-hour period, shredding a mammoth 401,925 pounds of paper. The community event, held at our Dallas service center and covered by KDFW FOX 4, not only provided a means to securely destroy documents, but also raised awareness of identity theft protection. With our recycling partners Iron Mountain and local media partners, we also held shredding events in Houston, Texas, Livonia, Michigan and Phoenix, Arizona. Together, the four events shredded and recycled more than 628,000 pounds of paper, while collecting food and monetary donations for local food banks. In total, these 2014 donations provided the equivalent of over 100,000 meals for local people in need. Comerica earned our first shredding record in 2012, with 111,920 pounds of paper. Our second record set in 2014 was eclipsed later in 2014, but we regained the record again with our May 2015 event in Dallas.

“Setting three world records within four years is a testament to the need and desire of North Texans to protect themselves from identity theft and to keep their sensitive documents out of local landfills. As the largest bank headquartered in Texas, we’re proud to have hosted not only the largest single community shredding effort in Texas, but in the world.”

- J. Patrick Faubion, Executive Vice President, The Business Bank, Comerica Bank and Comerica Incorporated, and President, Texas Market, Comerica Bank



Elder & Vulnerable Adult Abuse

Raising awareness on the financial exploitation of the elderly and vulnerable adults remains a high priority for Comerica. Our colleagues can be on the frontline of such abuse since a vulnerable customer's banker is often the first person to identify instances of financial exploitation.

Elderly people can be financially exploited by family members, caregivers, neighbors, or complete strangers. According to the National Center on Elder Abuse (NCEA), for every such case that reaches authorities, 44 cases go unreported, with elders losing an estimated \$2.9 billion annually due to financial exploitation. In 2014, 7,919 employees completed our course, Financial Exploitation of the Elderly & Vulnerable Adult, representing 99.9 percent of relevant staff. This course trains them to detect and act on red flags, and prevent our vulnerable customers from financial loss. Training is mandatory for customer servicing colleagues and others in a position to detect possible abuse.

World Elder Abuse Awareness Day

In recognition of the 2014 World Elder Abuse Awareness Day, Comerica colleagues provided speaking engagements to senior communities and senior sponsored events, as well as providing educational events to help identify the signs of financial abuse of elderly and vulnerable adults. We also stepped up our engagement by sending a national request for donations to Comerica colleagues. Their response was tremendous, distributing over 1,600 items to elder organizations in the communities we serve.

“One of the people who received your donations sent a note saying ‘who is this person that thinks about an old lady and how do they know that these things are the things we really want and need, I wish I could thank them in person!’”

- Micheline Sommers, Director of Older Adult Specialty Services, Oakland Family Services in Pontiac, Michigan

Understanding and Supporting Our Customers

“There are certain people who expect more from their bank. Some are working hard to build their dreams; others have already worked a lifetime to achieve them. Yet all of these customers demand one thing: the same unwavering commitment to excellence that defines their own lives. At Comerica, this is something we’ve understood for over 164 years. Which is why we provide the higher level of service, the higher level of knowledge, and the higher level of experience that our customers want, and deserve. It’s also how we deliver on our most sacred promise: to raise the expectations of what a bank can be.”

— *Comerica's Customer Promise*

Our customer-centric focus means we strive to deliver exceptional experiences that exceed our customer's expectations. To achieve this on a daily basis, we need to proactively understand our customers' needs. We use our Customer Promise to guide our interactions with current and potential customers to give them the service, knowledge, and experience they desire.

Sustainability Highlight: A Trusted Advisor Approach

In today's highly competitive market, one of the reasons behind our success is our ability to offer products that match the growing, increasingly-complex needs of our clients. Most of our colleagues understand that exposing clients to the right products doesn't start with "selling;" rather, it's identifying and understanding needs and offering value-based solutions. This "Trusted Advisor" approach relies on understanding our customers' needs and providing differentiated insights and distinctive services tailored to each customer to support their long-term growth.

By making thoughtful, deliberate investments in our people, products, and process, we work to provide our relationship managers the support needed to deliver an approach that truly raises customer expectations to a new level. Integrating the Trusted Advisor approach into everything we do allows us to better deliver on **The Comerica Promise**.



“What differentiates Comerica from the competition is our promise to raise customer expectations using a value-added, Trusted Advisor approach.”

- David Marvin, Executive Vice President, Middle Market Midwest, Comerica Bank

Supporting Small Businesses

We have seen small business customers make significant progress since the economic downturn to position their businesses to be leaner, more efficient, and more profitable. Small business lending is increasing, but the economic recovery for small businesses has remained muted. While businesses are generally more profitable and liquid than pre-recession, they continue to be cautious about adding leverage by investing in their facilities and equipment, or adding additional workers. Businesses also remain concerned about the impact of taxes and health care reform costs.

At Comerica, we are committed to supporting small businesses with over 125,000 small business customers and over \$1 billion in new small business loan commitments in 2014. Comerica has increased new small business loan commitments by 27 percent since 2012 and 146 percent since 2010. Our Small Business Administration (SBA) lending, including government-guaranteed 7a and 504 loans, totaled \$118 million in 2014. Our Banking Centers, typically located in areas where small businesses are concentrated, support businesses with under \$3 million in revenues while our relationship-based, Business Banking groups support businesses with \$3 to \$20 million in revenues.

Customer Satisfaction

Comerica prides itself on being a relationship bank, and building successful bonds with our customers is critical to our business. We do this by listening to each customer, taking the time to understand their individual personal and business needs. Our customers challenge us to provide personal connections while simultaneously satisfying their desire for efficiency and convenience.

We respond to customers' financial requirements by providing a competitive suite of products and services accessible at our network of banking centers, online, and via mobile devices. While ongoing economic challenges and the low interest rate environment have constrained our resources and impacted our ability to deliver some of the services our customers desire, we are working to meet the challenge by providing effective new products and services, as well as new methods of delivery. We continue to upgrade our physical banking centers and in 2014 piloted our banking center of the future (discussed later in this section under Innovation & Technology). During the year, we also enhanced the mobile delivery of banking services via Comerica apps, including click and capture deposits and person to person transfers.

We use customer interviews and surveys to solicit feedback that informs both our current and future product development strategies. We also use a formal process where managers from across departments review products under development through the lens of customer needs, industry benchmarking, the product's likely positive and negative impacts, and expected customer outcomes.

Feedback from customer survey data provides us with overall trends and guides our improvements to issues such as problem prevention and resolution. We also conduct customer satisfaction surveys at the individual banking center level, which provide managers actionable feedback to improve performance at the local level.

Customer Complaints

Comerica's Corporate Quality Process Department monitors, tracks, and resolves customer complaints, as well as product-related concerns raised by regulators. We evaluate complaint trends on an ongoing basis so we can identify systematic concerns and notify the appropriate business areas of potential process or service failures. Our goal is to prevent further such failures by providing feedback that results in swift improvements.



Our retail banking unit has numerous initiatives under way to encourage customers to save paper by not using paper statements. We're creating awareness on [our website](#), through posters in Banking Centers and through direct marketing efforts. We also offer a monthly fee discount for Access Checking customers who sign up for online statement delivery. Through 2014, 16.3 percent of personal accounts and 24.6 percent of business accounts had elected to receive only online statements. Overall, 18.1 percent of our almost one million customers have opted to discontinue receiving paper statements.

Customer Excellence Awards

For the seventh consecutive year, Comerica's customer contact center ranked 1st in 2014 among national and regional banks in the O'Connor & Associates survey on the effectiveness of sales agents' interactions with customers. We also received 14 national and regional awards for Middle Market Banking and Small Business Banking from Greenwich Associates.

Reaching Diverse Customers

We work hard to reach a diverse range of individual and business customers through our 19 targeted Market Segmentation Initiative (MSI) teams, which pursue strategies to meet the banking needs of the groups shown in the following graphic. These teams operate across our primary markets, establishing relationships with relevant business and community leaders and organizations. In 2014, more than \$750 million in new account openings resulted from business referrals due to MSI outreach.

Comerica MSI Outreach Groups

| | | | |
|--|----------------|---------------|-----------------------|
| African American | Asian Indian | Asian Pacific | Hispanic |
| Lesbian, Gay, Bisexual, and Transgender (LGBT) | Middle Eastern | Women | Military and Veterans |

In 2014, we increased the number of MSI teams to 19, up from 17 in 2012. Each team is supported by Comerica business unit officers, and has an outreach budget to conduct financial education programs in partnership with relevant business and professional associations, as well as nonprofit organizations serving these often under-banked target communities. Examples include programs on lending for small businesses, cybersecurity, wealth building, and basic financial literacy.

Diverse Customer Outreach in Action

MI African American MSI Team:
Wealth building program presented to NABA
(National Association of Black Accountants)

CA Middle Eastern MSI Team:
Nowruz (Iranian New Year) celebrations in
three banking centers

TX Asian Indian MSI Team: Financial
education program with IT Serve Alliance, a
South Asian Indian professional association

Sustainability Highlight: Diversity Recognition

We are proud of our diversity efforts and, to help benchmark our efforts, participate in recognized corporate Diversity rating surveys. These include surveys by *DiversityInc.*, *Black Enterprise*, *Latina Style* Top 50, the Hispanic Association on Corporate Responsibility (HACR), *Hispanic Business Magazine* and the Human Rights Campaign's Corporate Equality Index. Comerica has been ranked by these rating organizations among the top companies for diversity efforts, and received an impressive 100 rating from the CEI for our work to ensure inclusion for LGBT colleagues and community members.

Impact Topic Customer Education & Financial Literacy

We are committed to helping current and prospective customers make wise choices on how they manage finances. Taking the time to ensure customers understand the best products and services to meet their needs is what **Customer Centricity** is all about. For example, our Retail Bank uses “Did You Know?” guides to help both colleagues and customers better understand our offerings. Our Business Bank uses a program that supports business customers by providing innovation and insight, risk management, employee management, and personal financial management. By understanding our customers' needs and educating them on the products and services that best fit these requirements, we build deep and enduring customer relationships.

Promoting Customer Education

We educate our customers using a variety of methods. Transparent communication supports our customers by engaging with them in the way that proves most effective for their individual needs.

Promoting Customer Education Through Transparent Communications

One-on-one conversations

Customer Contact Center

Written communications

Online resources

Sustainability Highlight: Going to the Customer

In a pioneering Hispanic market segmentation initiative, several Comerica departments collaborated to help over 200 individuals become first-time banking customers. Our client, a large construction company, needed an alternative way to issue payroll checks as they were physically delivering checks to over 1,000 hourly employees in multiple cities at multiple job sites. Comerica spearheaded the conversion to a checkless payroll process via Direct Deposit and Workplace Card.

Over a three month period, about 25 Comerica colleagues held informational meetings with teams at each of our client's work sites. Nearly all the workers spoke Spanish as their preferred language, and many had never owned a checking account or credit card; they were cautious with respect to bankers. Bilingual Comerica teams presented to workers, one crew at a time, inside the construction trailer, under the shade of a tree, or at the back of a pick-up truck.

Based on its success, the program is looking to be replicated in additional locations. The human impact is real: a Comerica colleague encountered one of these new customers, who broke into a huge smile of recognition and happily displayed his Comerica Workplace Card, which he had used to make a purchase at a business that only accepts debit and credit cards.

Financial Literacy

Our Core Value of **Involvement** also drives our efforts to increase financial literacy across our communities. Comerica collaborates with non-profit providers including Junior Achievement, Operation Hope, and Money Management International to teach financial basics to people in underbanked areas. In 2014, we sponsored 611 financial literacy events, at which we had 448 instances of colleagues volunteering. These empowering programs reached over 32,000 low and moderate income individuals across our markets.

“Comerica partners with experts in the field of financial literacy education who provide training to Comerica colleagues seeking to volunteer their time to educate low- and moderate-income individuals regarding budgeting, checking and savings accounts and the use of credit. Comerica is committed to providing this education within its communities so as to provide the necessary building blocks to help community members develop assets and create wealth.”

- Kathryn A. Reid, Senior Vice President & Director, Corporate Public Affairs & Community Reinvestment



Impact Topic Innovation & Technology

Technology is becoming increasingly important for executing our business strategy as our customers grow more comfortable with online means of accessing their accounts and conducting routine banking transactions. Recognizing this, we are increasingly utilizing technology and demonstrating innovation across our existing, and newly developed, products and services.

| Retail | Business Bank | Wealth Management |
|--|--|--|
| <ul style="list-style-type: none">Our experienceCenter is a test-and-learn environment to vet new technologies, delivery channels, and services in real time in a banking center setting.The Small Business Resource Center launched in 2014 to provide a wide variety of web-based tools and resources to small business owners. | <ul style="list-style-type: none">Launched a suite of new integrated solutions - Integrated Payables Web, Integrated Receivables, and Integrated Cash Position Manager - to help businesses manage payables, receivables, and cash flow.Formed the Comerica Treasury Management Strategic Advisory Council including customer members in our primary markets to provide feedback and insights to improve the services we provide. | <ul style="list-style-type: none">Business Owner Advisory Webcasts provide an on-demand opportunity to share educational resources with our customers on a variety of current topics.Electronically-delivered Weekly Market Overviews help keep customers up to date on a range of topics including U.S. and international markets, real estate, and alternative investments. |

Our technology focus includes countering the expanded array of cybersecurity threats across our industry that pose risks to the privacy of our customers' information (For more, see [Customer Protection and Cybersecurity](#)). Our investments in technology also support customer service, by enabling us to improve our data quality, deepen insights into customer demands, and improve efficiency.

Sustainability Highlight: Banking Center of the Future

Developed and constructed in 2014 and opened in first quarter of 2015, our newest banking center in Peoria, Arizona, represents the banking experience of tomorrow. In addition to a new, progressive design, it features an array of leading edge technology and sustainability features. These improvements will help our staff engage more deeply with customers by placing less emphasis on transactions and more on consultative services. Example features include:

- Interactive teller machines, which feature secure video conferencing with a banker who can assist with transactions and account questions
- Technology bar containing tablets and smartphones for demonstrations and training on the use of Comerica's mobile banking products
- Teller Cash Recycler pod in place of traditional teller stations —making counting, adding or dispensing cash more secure and efficient, and allowing banking staff to spend more time with clients
- Energy saving self-tinting glass on exterior floor-to-ceiling walls
- Digital marketing wall, which streams news, stock tickers, and marketing graphics, doubling as brand signage at night
- Collaboration rooms, which can be quickly converted from individual office spaces to private conference rooms for meetings and customer presentations



“We believe our customers will benefit from a combination of higher technology and higher personal service and attention, which further demonstrate our commitment to the market and our relationship approach to banking.”

- Annette G. Musa, President, Arizona Market,
Comerica Bank

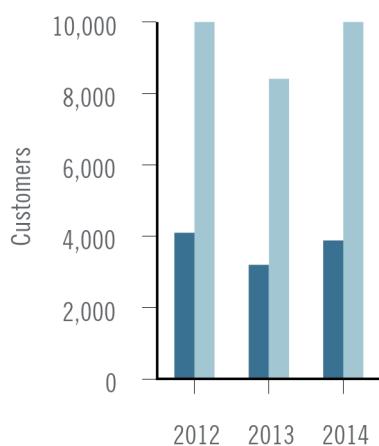


Improving Banking Access & Serving the Underbanked

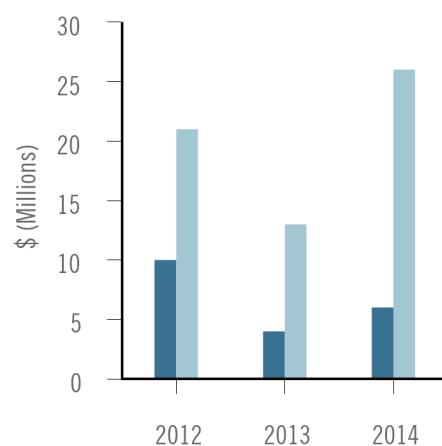
Impact Topic Serving the Underbanked

We thrive when our customers and communities are successful. For our customers and communities to prosper, people need access to basic financial services such as depositing, savings, and credit. Knowing this, we work hard to expand financial inclusion. We seek to develop and offer the right products at the right times to meet the financial needs of each community where we operate. A prime example is the Comerica Convenience Card, a general purpose reloadable prepaid card offered to customers who do not qualify for a standard checking account. Similarly, we offer our personal, noninterest Access Checking Account for customers who prefer a flat monthly fee and want flexible options to waive fees that are not balance related. Used by over 14,000 low and moderate income Comerica customers, this is an affordable choice for consumers who may not qualify for a traditional bank account.

Access Checking Customers



Access Checking Balances



To accommodate non-English speaking customers, we offer Spanish options on our ATMs and throughout the Customer Contact Center. Our Interactive Voice Response (IVR) for phone calls has options in Spanish and English and Spanish speaking agents are available in our Customer Contact Centers. In addition, we offer translator services to assist customers with our products and services in other languages on an as needed basis.

We evaluate our locations in the communities we serve and periodically, we relocate certain banking centers to provide more convenient and visible locations. We also refurbish older banking centers to update the look, improve environmental performance, enhance efficient service, and improve the customer experience.

| | | | |
|------|-----------------|------------------|--|
| 639 | 480 | Multiple | Over 95% |
| ATMs | Banking Centers | Languages Served | ATMs meeting Americans with Disability Act standards |

Product Choice

We offer a full range of retail banking products. Delivery methods take advantage of the latest technology and include bricks and mortar banking centers, electronic, phone and mobile banking, and our customer contact center. Products are available in areas of low population and to low income customers. We always look to improve our offerings, and to expand access to banking services. In addition to benchmarking against other financial service providers, we use feedback from current and prospective customers to enhance our products and services. Methods include external surveys, focus groups, our customer online community, and direct customer feedback from our banking centers, call center, and social networks.

Steps to Designing Products to Meet Customer Needs

| | | |
|---|------------------------|---|
| 1 | Customer Feedback | Focus groups Online customer community Quantitative research Branch/Call Center/social feedback channels |
| 2 | Competitive Assessment | Analysis of competitive offers and adoption rates |
| 3 | Functional Testing | Employee user groups ensure proper functionality prior to customer rollout |
| 4 | Implementation | Staged rollout Pilots to optimize functionality when possible Gather customer feedback and adjust as needed |
| 5 | Analysis | Measure results Provide recommended improvements |

Sustainability Highlight: Delivering Benefits Electronically

In 2008 and again in 2014, Comerica Bank was selected by the United States Treasury as the Financial Agent for their Direct Express® Debit MasterCard® Program. Comerica Bank is the only issuer of the Direct Express® debit card for federal benefit recipients. Since 2013, the U.S. Treasury has required all federal benefit recipients (with a few grandfathered exceptions) to receive their monthly benefits electronically, either by direct deposit or through the Direct Express® debit card.

The Direct Express® debit card allows Social Security recipients, and other federal benefit recipients across the country, faster access to their funds than with paper checks. Since June 2008, the Direct Express® card has helped more than 4 million Americans — most of whom did not have traditional bank accounts when they signed up for the card — to safely and conveniently access their federal benefit payments electronically. Direct Express® transactions are covered by regulations that protect federal benefit recipients, and funds on the cards are FDIC insured. The Direct Express® fee structure is provided by Comerica when issuing new cards and is also located on the Direct Express® website. The Direct Express® program has had consistently high cardholder satisfaction rates (95%) for the last five years.

Protecting Vulnerable Benefit Recipients from Fraud

In October, 2014, President Obama issued an Executive Order that all federal card programs must present a plan by the end of 2014 to become EMV (Europay, MasterCard, Visa)-compliant (i.e., cards with chip and PIN technology). Comerica provided the EMV compliance plan to the Bureau of the Fiscal Service and is currently rolling out the plan. Direct Express® is the largest debit card program to undertake a complete portfolio reissuance.

Delivering Financial Education with Government Benefits

Comerica and MasterCard International also provide Direct Express® cardholders with PayPerks, a web- and mobile-enabled financial education platform for federal benefit recipients who use the Direct Express® reloadable MasterCard®. With its tagline, “The more you learn, the more you earn!” PayPerks aims to educate the financially underserved to use their benefits wisely, and offers incentives like point systems and cash awards for learning and making smart spending decisions.



“Cybersecurity and financial education and enablement are critical components of the Direct Express® program. Therefore, as Comerica issues over 4 million cards enabled with chip and PIN technology, we are launching new financial education modules specific to preventing fraud. The Direct Express® program has a low incidence of fraud and our actions are targeted to continue to protect Direct Express® cardholders while enhancing their financial literacy.”

- Nora T. Arpin, Senior Vice President and Director, Government Electronic Solutions, Comerica Bank

Impact Topic Responsible Marketing & Sales

Fulfilling **The Comerica Promise** includes presenting our products to consumers in an open and fair fashion. In line with our Core Values of **Integrity** and **Excellence**, we review our marketing communications before release to ensure they comply with relevant regulations and laws including the Equal Credit Opportunity Act, the Truth in Lending Act, and the Truth in Savings Act. The Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC) also regulate some types of marketing materials, and we carefully review and approve such material through our legal, risk, and compliance processes. Comerica monitors compliance with marketing laws and regulations through our performance in regulatory agency examinations, internal audits, and internal monitoring and testing. We also review relevant customer complaints to identify potential issues.

Fair Lending/Anti-Discriminatory Business Practices

We have internal policies and procedures to meet U.S. regulatory requirements for customer contacts and interactions, including clearly stated interest rates, as well as other terms and conditions. We require relevant colleagues to complete comprehensive annual fair lending and anti-discrimination training, with 99.9 percent of applicable employees doing so in 2014.

Comerica relies on the results of regulatory examinations, internal audits, and monitoring and testing to verify our performance. In 2014, we had no incidents of non-compliance related to fair lending, anti-discriminatory regulations, anti-competitive behavior or anti-trust or monopoly practices that would have a material adverse effect on our operations or ability to perform the services we offer.

EMPLOYEES

Comerica's strength has always been its colleagues, and 2014 was no different. To meet and exceed our customers' expectations, we strive to make Comerica the preferred bank at which to work in our key markets. We recognize our colleagues' hard work, and we are dedicated to fostering a diverse and inclusive workplace. We offer competitive wages and benefits and are committed to providing a healthy and safe working environment for all. To help build trust and loyalty, we strive to communicate regularly, openly, and honestly with colleagues, and offer opportunities for growth through our learning and development programs. We do this so that when we hire top talent, they stay at Comerica, which in turn provides our customers with the relationship banking experience they desire.

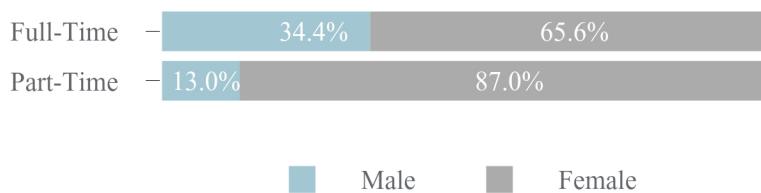
“As Comericans, we are unified in our desire to deliver ongoing growth and shareholder value. Yet we are also bound together by something more powerful and distinctive: an unwavering commitment to each other. We believe that our character and values define our Comerica work experience and form the foundation of a unique, caring and collaborative culture. We believe that this appreciation for our internal relationships is manifested in our relationships with our customers, and serves to distinguish us from ordinary financial institutions. In this way, every day, we are raising the expectations of what a bank can be.”

— The Colleague Promise

| | |
|-----------------|--|
| 2014 PROGRESS | Delivered strategic learning and development initiatives focused on new employees, supporting customers, performance leadership, and new managers |
| | Increased our nationwide outreach to military veterans through work with veteran's organizations and participation in career fairs to help attract military veterans to Comerica |
| | Comerica's leaders focused on diversity as a business and leadership imperative |
| 2014 CHALLENGES | Finding the best ways to source and retain key talent as resources across the industry become scarce |
| | Continuing to invest in colleague and HR programs while managing within the tight expense environment, to ensure we are investing in the right programs at the right level to achieve our long term goals |
| | To remain competitive in the markets we serve, continuing to create a pool of talent as well as a cadre of high performers who can implement strategy and get results. Learning and development practices must continue to evolve to meet both business targets as well as the development needs of our colleagues |

At year end 2014, we had 9,090 total employees (8,484 full-time and 606 part-time). There were 8,876 employees on a full-time equivalent (FTE) basis.

Permanent Workforce by Labor Type & Gender



Impact Topic

Employee Engagement

By engaging with colleagues, we encourage them to be more productive and loyal, which benefits our bottom line. Our learning and development programs help our people reach their potential. Nearly all Comerica colleagues hold annual performance review discussions with their managers that include conversations about future development and colleague interests.

The impacts of our management approach are shared regularly with senior management, and include reviewing results based on demographic, career, and diversity targets.

Communicating with Employees

Comerica operates in a dynamic and competitive industry in which collaborating successfully with colleagues is critical to success. Open lines of communication between colleagues and leaders are an integral part of our 165-plus year culture. We believe strongly that this direct relationship underpins our success in maintaining a great work environment, one that is collaborative and in which colleagues are treated with dignity and respect.

We work hard to keep our 9,090 employees informed about company activities. We regularly engage colleagues through multiple channels of communication and, with an eye on improved performance, we provide our colleagues with pathways to engage with senior leaders as shown below.

| | |
|---|---|
| Employee Pathways for Communicating with Senior Leadership | Communicate directly with non-management directors by sending written correspondence to the Secretary of the Board for Comerica Incorporated |
| | Provide feedback to leadership through Employee Owners Meetings, managers, and company email |
| | Email the Chief Human Resources Officer (CHRO) directly or raise questions at the Employee Owners Meetings about benefits or other human resources topics |
| | Connect through other departmental leadership meetings |

Comerica provides multiple channels for employees to report complaints including our intranet site, communicating directly with managers, Human Resources, Employee Relations, the Legal department or the employee hotline. We also provide an internal Problem Resolution Procedure designed to ensure that employees have the opportunity to formally address their concerns and present alternative solutions regarding their conditions of employment. We also maintain an anonymous employee hotline, used to record and resolve employee grievances. In 2014, 74 complaints were recorded via the hotline, all of which were resolved. There were no labor practices grievances filed through formal grievance mechanisms in 2014.

Impact Topic

Diversity & Inclusion

Employee Diversity

Diversity is one of Comerica's Core Values. Welcoming and supporting colleagues of all backgrounds is a pillar of **The Comerica Promise** that we make to our colleagues, and is key to the way we conduct business. Comerica is an equal opportunity employer and our policies, programs, and practices align with this commitment. As a federal contractor, Comerica also develops affirmative action plans to ensure equal opportunities for all colleagues. Our [Equal Employment Opportunity Policy statement](#) is reviewed and signed annually by the Chairman and CEO and posted for employees.

Comerica's Executive Diversity Council, led by our Chairman and CEO, and made up of the executive leadership team, sets annual and long term diversity goals focused on four areas - human capital, employee engagement, business outreach and supplier diversity. Activities to meet these goals include targeted recruitment activities and support for 17 employee resource network groups (ERNGs). The latter provide peer networking, mentoring and development opportunities for minority, female, veteran, lesbian, gay, bisexual and transgender (LGBT), and quantitative analysis team colleagues.



Comerica Diversity ERNG Team Leaders network and share best practices at Passport to Diversity event



“As one of our Core Values, diversity enhances our ability to value similarities and differences to create a richer work environment that encourages creative thinking and solutions. In turn, we improve our business value by realizing benefits from a broad range of ideas, viewpoints, and backgrounds working together to produce superior products and services for a diverse marketplace.”

- Curtis C. Farmer, President, Comerica Incorporated and Comerica Bank

We track results against our four priority areas of the Executive Diversity Council. Diversity goals are established for all divisions and included in the performance plans of department leaders and employees. In 2014, we began requiring diversity goals in all employee performance management plans.

Comerica's diversity efforts also extend to our customers through our 19 Market Segmentation Initiative (MSI) teams, which pursue strategies to meet the banking needs of minority, female, LGBT, veterans and women business owners and professionals. For more information on our MSI teams, please see [Understanding and Supporting Our Customers](#); for diversity in relation to Comerica's Board of Directors, see [Corporate Governance](#); and, to learn more about how we seek to work with diverse suppliers, see [Supplier Diversity Program](#) under the Supply Chain section of this report.

Attracting Diverse Talent

We work hard to attract and retain the best talent from all backgrounds. Our Diversity Recruiting Strategy delivers a qualified diversity applicant pool that reflects the demographics of our markets through a focus on women, diverse populations, LGBT & Allies, veterans and individuals with disabilities. Some of the organizations which we work with include the Urban Financial Services Coalition, the Department of Rehabilitation/National Employment Team Vocational Rehabilitation, U.S. Chamber of Commerce Hiring our Heroes, Equality Professionals Network Dearborn, Arab Community Center for Economic and Social Services Michigan, and student organizations at select universities. Comerica also reaches a broad network of posting services that target Hispanic and other minority focused readers including iHispano.com, a network of more than 1 million Latino professionals.

In 2013-14, we stepped-up our nationwide outreach to veterans, building relationships with organizations such as Orion International and Veterans Recruiting services, and participating in multiple career fairs for recruiting military personnel. To strengthen our outreach to diverse applicants, in addition to external partnerships with diversity organizations, we established relationships with internet-based vendors for job posting organizations such as localjobnetwork.com. In 2013, we also launched a Veterans and Military MSI providing targeted outreach to veterans, military personnel and their families to strengthen access to banking services and financial education. Comerica also launched the Veteran Leadership Network, our latest employee resource networking group, in 2014.



“As the chair of Comerica’s latest Employee Network Resource Group, the Veteran Leadership Network, and a former Captain in the United States Army, I know firsthand the challenges many of our veterans face in this or any economy. There are many opportunities, too. At Comerica, you will find them in the areas of job training, networking, career mobility, and professional development, among others.”

- Tora C. Adams, Vice President, Human Resources Consulting

Diversity Awareness & Learning

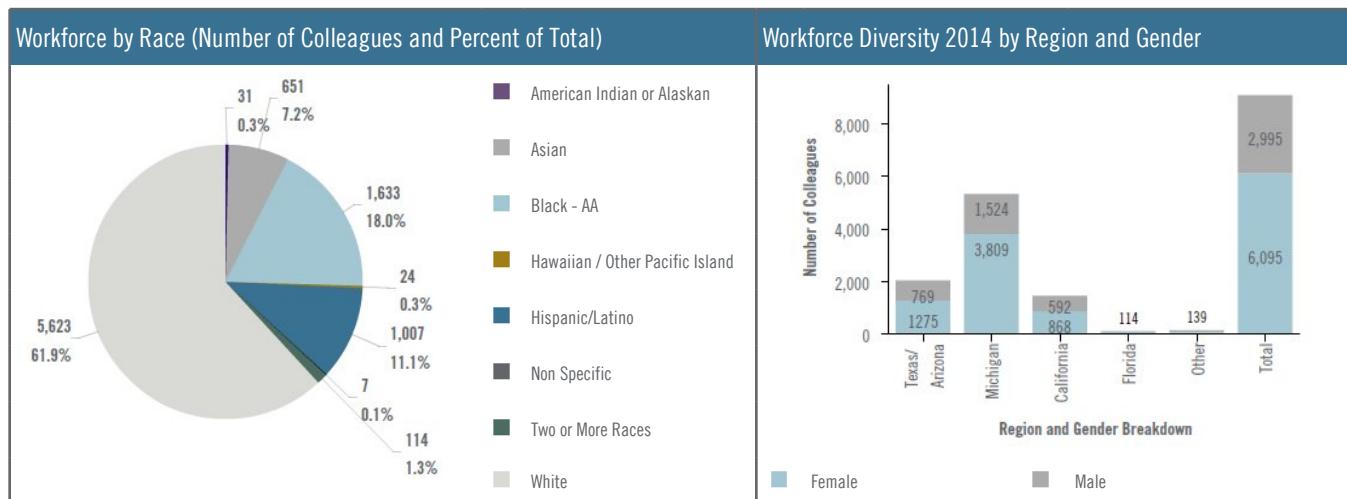
We encourage our colleagues to embrace and celebrate each others' differences and require that they complete diversity education courses to foster an atmosphere of inclusion in the workplace. In 2014, our diversity program was prominently included in a new employee orientation tool, while our annual employee diversity education program requirement focused on generational differences. In addition, our Master of Diversity Awareness (MDA) program, developed by Comerica colleagues, was rolled-out company-wide and achieved a nearly 85 percent enrollment by year end 2014. The MDA program covers nine dimensions of diversity through a variety of activities and has created a healthy challenge among departments and colleagues to complete increasing levels of programming to earn bronze, silver, gold, and platinum status for achievement of learning levels.

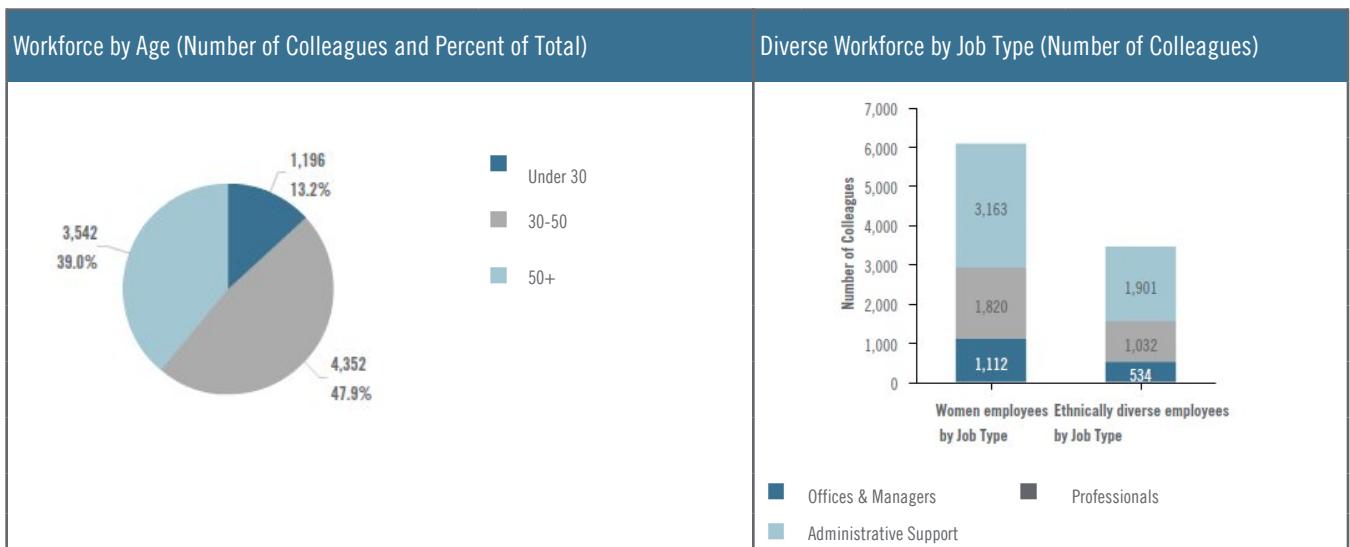
2014 Status: Number of Colleagues Who Have Achieved MDA Level Certifications

| 5,028 | 3,536 | 2,373 | 1,237 |
|-----------------------------------|-----------------------------------|---------------------------------|-------------------------------------|
| Bronze-Level Certified Colleagues | Silver-Level Certified Colleagues | Gold-Level Certified Colleagues | Platinum-Level Certified Colleagues |

Comerica's Local Diversity Awareness Round Tables (LDARTs) provide a local market guide for diversity learning. LDART members represent the interests and needs of colleagues across the market. The LDART members plan, communicate and execute Diversity Learning options for colleagues in the market. Additional diversity learning opportunities in 2014 included:

- Presentations of “Anyone Can Be An Ally,” a video on the challenges faced by LGBT colleagues in the workplace.
- “India in 60 Minutes,” an educational program on Indian history and culture from the Asian Indian Alliance, an employee resource network group.
- Presentations of the film “Miss Representation” on media portrayals of women and how they impact the success of women in the workplace.





Impact Topic

Talent Attraction, Retention, & Development

To remain competitive in the markets we serve, we know our recruitment, learning, and development practices must continue to evolve to meet both business targets and the needs of high performing colleagues.

Acquiring New Talent

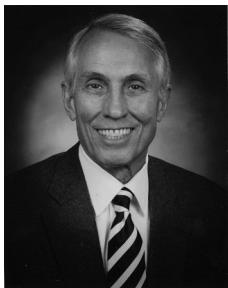
Our business depends on attracting and retaining bright talent. Comerica uses a talent acquisition model to:

- Help source and hire effectively and efficiently
- Utilize sourcing strategies to complement recruiting activities
- Use advanced technology to identify, influence and attract top talent
- Advise and consult with business units to develop sound strategies and hiring decisions
- Offer a robust pipeline of candidates to managers
- Provide scalable talent acquisition resources nationally
- Develop the necessary resources to effectively assess talent in the marketplace

Comerica's Military Recruitment Program

Since the start of Comerica's military recruitment program in 2013, Comerica has seen an incremental increase in its number of veterans hired and percent of overall workforce. In 2014, technology was implemented to better track talent into the organization both during the job application process and hiring process. Our Talent Acquisition team and colleagues continue to seek opportunities to attract, recruit and hire veterans. Comerica's newly founded Veteran Leadership Network Employee Resource Network Group (ERNG) has been actively engaged in further developing programs to educate our colleagues about veterans, assisting in building awareness and supporting outreach activities. Additionally, Comerica is partnering with Orion International, the nation's largest recruiting firm specializing in the placement of former military professionals into the civilian workforce.

In 2014, Comerica colleagues participated in roughly fifteen veteran recruiting events, including veteran-focused virtual career fairs, traditional career fairs and a student networking event.



“At Comerica, we honor those who have served our country. As a veteran of the U.S. Army Infantry, I know and understand the unique strengths that veterans bring to an organization. These include having strong interpersonal skills, respect for procedures and accountability, and a sharp focus on teamwork. We value these and other such attributes among candidates seeking employment at Comerica.”

- Jon W. Bilstrom, Executive Vice President, Governance, Regulatory Relations and Legal Affairs

Learning & Development

The majority of our development instruction is experientially based. Coaching and mentoring account for roughly 70 percent of training, learning through exposure accounts for 20 percent, and classroom activities account for the remaining 10 percent. Senior management regularly reviews the results of our management approach based on demographic, career, and diversity targets.

Performance

In 2014, the total average hours of training per employee (including mandatory training) was 22 hours. 6,613 skills-based courses were offered to Comerica employees, and 83 percent of employees took advantage of non-mandatory, non-compliance training to improve their knowledge base.

We also introduced several new learning and development initiatives during the year, including:

| | | | | |
|--|--|---|--|---|
| The virtualization of the new employee orientation program | The Trusted Advisor and Performance Leadership workshops for the Business Bank | First Time Manager learning program supporting new managers on 17 key topics and skills | New Manager learning program consisting of 12 courses for newly-hired managers | Enterprise-wide Enhanced Colleague Onboarding program |
|--|--|---|--|---|

Growing our Leaders

Comerica launched our Leadership Development Program in 2011 to develop our future leadership talent in an experiential setting, including project work to address key strategic challenges. In 2014, 44 employees completed the Leadership Development Program (LDP), which brings together middle management colleagues and senior leaders for skills development and mentoring. The colleagues researched and provided recommendations to address challenging strategic bank issues, culminating with final presentations to Comerica executives and senior leaders.



“What I love the most about the Leadership Development Program is that the learning and growth that comes out of it is subtle. It is not from an article that we read or a class we take. It is from the individual experiences that are unique to each person.”

- Laura A. Kurowski, Vice President, Corporate Human Resources General Compensation Manager and 2014 LDP Participant

As an example of the LDP team's project work, one of the first LDP teams worked on a project to find ways to effectively communicate Comerica's corporate strategy. The LDP team identified a gap in colleagues' understanding of the corporate strategy, which led to the refresh of our internal communication approach. The result of this work has been seen in **The Comerica Promise**, launched in February 2014, which works to remind colleagues of the company's Core Values, our commitment to customers, and our commitment to our colleagues. For more information, please see [The Comerica Promise](#).

Employee Turnover

Comerica's 2014 turnover rate was 14.3 percent, a decrease of 0.3 percent from year-end 2013, which was mostly driven by a decrease in involuntary turnover. The Corporate Leadership Council (CLC) 2013 benchmark study indicates a benchmark average turnover rate of 15.4 percent and a 50th percentile of 14.0 percent. Comerica's 2014 turnover rates were less than the CLC benchmark average and flat to the 50th percentile. The spike reported in our 2012 report of 16.9 percent turnover was primarily due to the Sterling Bancshares acquisition and conversion.



In an effort to assist managers in retaining top talent, retention initiatives were implemented in 2013 and 2014. A Retention Toolkit was developed to help managers become more proactive in assessing retention risks and impacts. The toolkit provides guides and assessments to help retain employees, as well as key discussion points highlighting reasons to stay at Comerica.

In 2014, a new online employee exit survey was developed and piloted. This tool provides an opportunity to better understand why individuals leave the bank so we can develop targeted programs to address any issues identified. The exit survey process is being finalized and is expected to roll out in 2015.

Performance & Recognition

Comerica strives for a robust and efficient performance management process that incorporates system tools, and candid and constructive discussions between managers and colleagues to help achieve both the company's objectives and our employees' goals. Comerica managers hold annual performance review discussions with their employees. In 2014, we completed performance reviews for nearly all full-time employees, as shown below:

- Male employees — 95 percent
- Female employees — 97 percent
- Senior managers — 94 percent
- Middle managers — 97 percent
- Technical employees — 98 percent

We use an online recognition tool (CoStar) for managers, peers and colleagues to send ecards, as well as tangible and cash awards to individuals who stand out for demonstrating Comerica's Core Values in their work. In 2014, we recognized 2,571 colleagues with a CoStar award and colleagues sent over 13,000 Thank You e-cards to congratulate colleagues on a job well done.

Equal Remuneration

Comerica periodically performs salary analysis by grade level and position to ensure colleagues in similar positions are being paid comparatively to the extent other factors can be equalized (i.e. time in position, performance, education, etc.). However, there are significant differences in job functions from the division to the individual level across our diverse organization. Given these differences, aggregated data on remuneration without detailed accompanying context makes comparisons difficult. To help us better understand and manage these differences, evaluations are ongoing in 2015 in partnership with outside consultants.

Employee Benefits

Our colleagues play an essential role in our ongoing success. We in turn offer competitive pay and a comprehensive, competitive benefits package. Comerica's benefit programs are offered across our geographic areas. We offer the following benefits to full-time employees:

- Medical*
- Dental*
- Vision*
- Employee Assistance Programs*
- Short-term Disability/Long-term Disability
- Life Insurance, AD&D, and Dependent Life*
- 401(k) Plan with Employer Match*
- Retirement Account Plan*
- Employee Stock Purchase Plan*
- Health & Dependent Care Flexible Spending Accounts, Commuter Benefits, and Health Savings Accounts*
- Financial Product Discounts
- Paid Time Off Program*
- Paid Holidays*
- Group Legal
- Tuition Assistance Program (TAP)

*Benefits also offered to part-time employees scheduled to work at least 20 hours per week.

Each year, we review our benefits ensuring that they remain comparable to the benefits offered at similarly sized financial organizations. Comerica implemented the annual Total Rewards statement in 2013 which highlights the total rewards package for each colleague, providing a visual representation of the value of benefits provided in addition to salary. Through better communication to colleagues and the use of friendly competitions, we have increased readership of the Total Rewards statement from 50 percent in 2012 to 71 percent in 2014.

Generally, on an annual basis, Comerica provides a merit opportunity to eligible colleagues. Merit dollars are allocated based on an individual's performance and position within our salary ranges for that particular job.

Employee Assistance

Comerica offers career transition assistance to employees affected by a job loss due to workforce reductions, including employment resources and career consultation at all levels. In addition, our employee assistance program offers free and confidential support to colleagues and their families that are experiencing personal or professional difficulties. In 2013, we enhanced the confidential support services available, and in 2014, 1,737 employees took advantage of the program.

We offer tuition assistance and disability support programs to full time employees. In 2014, Comerica provided tuition assistance to 226 employees, representing \$801,200 in additional benefits.

Health, Safety & Wellness

Comerica's Health and Safety Policy provides colleagues and managers with guidelines for creating and maintaining a healthy work environment and complies with Occupational Safety and Health Act requirements. The employee assistance program provides resources to support colleagues in weight management, tobacco cessation, as well as health and wellness coaching. Managers and human resource consultants also work with the program's external service provider to offer training sessions on workplace health and safety.

The Facilities Management and Corporate Real Estate Teams manage environmental issues including indoor air quality, asbestos, lead-based paint, and mold. When concerns arise, we follow relevant industry and regulatory procedural guidelines. Incidents are tracked and reported to the company's Environmental Health Committee, which meets quarterly to evaluate new concerns and determine company-wide and site-specific protocols.

ENVIRONMENT

Comerica is committed to being a good steward of the environment. We recognize that delivering value for our shareholders, employees, communities, and other stakeholders, including future generations, requires working to minimize our own environmental footprint and support environmentally beneficial companies and projects.

Environmental Sustainability Program Timeline

| 2008 | Feb | Sep | 2009 | Feb | May | 2010 | Apr | Oct | 2011 | May | Sep | 2012 | Apr | May | 2013 | Apr | May | 2014 | May | Jul |
|--|-----|--|--|-----|---|------|---|-----|---|-----|---|------|---|-----|---|-----|---|------|-----|-----|
| First listing on CDP Climate Disclosure Leadership Index (CDLI) after first CDP report published in May 2008 | ↓ | ↓ | Comerica opens first LEED-certified banking center (Fossil Creek Banking Center in Fort Worth, TX) | ↓ | First external stakeholder consultations conducted with NGOs and SRIIs | ↓ | Comerica's fourth listing on CDP's CDLI | ↓ | Third consecutive ranking among top 100 U.S. companies on Maplecroft Climate Innovation Leaders Index | ↓ | Implemented Comerica's green loan tracking system | ↓ | Comerica's first listing on CDP Climate Performance Leadership Index (CPLI) for GHG reduction efforts | ↓ | Comerica announces attainment of first GHG reduction goal; exceeded goal (18.9% vs. 15%) one year early | ↓ | ↑ | ↑ | ↑ | |
| Creation of Corporate Sustainability Office (CSO) and official launch of program | ↑ | ↑ | Launch of Comerica's Green Office Team Program | ↑ | First company-wide Earth Day observances by employee Green Office Teams | ↑ | Introduced supplier sustainability questionnaire to our largest and key commodity suppliers | ↑ | Comerica announces first real estate related greenhouse gas (GHG) emissions reduction target (15%; 2008-2014) | ↑ | Development of first formal GHG inventory management plan | ↑ | First external verification of Comerica's GHG emissions | ↑ | Sustainability intranet site launched for Comerica employees | ↑ | 2014 Dallas Shred Day receives second GUINNESS WORLD RECORDS® certificate | ↑ | ↑ | |
| 2014 PROGRESS | | <p>Reduced our overall Scope 1, 2, and 3 emissions (vs. 2013)</p> <p>Reduced our waste to landfill and water/paper consumption (vs. 2013)</p> <p>Increased our coding of environmentally beneficial loans (vs. 2013)</p> | | | | | | | | | | | | | | | | | | |
| 2014 CHALLENGES | | <p>Lower budget available for larger capital energy efficiency projects due to prolonged economic climate and costs associated with compliance with new regulatory requirements on the banking industry</p> <p>Further significant diversions of waste from landfill difficult due to waste container siting requirements by municipal or development owners and the cost of implementing programs at retail banking centers where small quantities of recyclables generated</p> | | | | | | | | | | | | | | | | | | |

Our Approach to Environmental Sustainability

The pursuit of environmental sustainability is embedded into our corporate culture and day-to-day operations. We manage issues relating to environmental sustainability in our operations and supply chain through our Corporate Sustainability Office, cross-functional teams, operations-related departments, and our senior level Sustainability Council. The Council sets our sustainability strategy and goals and consists of senior leaders from the following divisions/departments: Retail Bank, Business Bank, Wealth Management, Procurement, Real Estate, Human Resources, Investor Relations, Information Services, Enterprise Risk, Environmental Risk, Corporate Communications, Marketing, and Business Affairs. We develop and execute an annual action plan to ensure we continue making environmental sustainability progress.

Comerica's Long-term Environmental Sustainability Goals

- Reduce corporate impact on the environment from greenhouse gas emissions
- Decrease the amount of materials consumed and business waste disposed at landfills
- Use our water resources wisely
- Raise the environmental performance of the products and services that we purchase
- Seek additional environmentally beneficial lending opportunities that meet Comerica's credit standards

| Key Environmental Indicators | 2014 Quantity | Percent Change (2014 vs. 2013) |
|---|----------------------|---------------------------------------|
| Real Estate Related Greenhouse Gas Emissions (MtCO ₂ e)- Scope 1 & 2 | 72,247 | -3.2% |
| Waste disposed at landfill (short tons) | 1,732 | -16.2% |
| Total office copy paper consumed (short tons) | 1,039 | -11.4% |
| Water consumed at metered facilities (cubic meters) | 349,785 | -15.1% |
| Percentage of computers purchased with IEEE- EPEAT Gold Rating | 100 | 0% |
| Percentage of furniture purchases that met BIFMA level® certification | 87 | -2.2% |
| Environmentally beneficial lending (\$ Millions) | 975 | 25% |

Impact Topic Climate Change

We understand that climate change is occurring and believe companies have a role in changing the "business as usual" model of how the world's finite resources are used. Comerica's [Environmental Policy Statement](#) commits us to adopt responsible practices that reduce our climate change business risks while identifying new business opportunities that help mitigate the impacts of rising global temperatures.

We have reported annually on CDP's climate change questionnaire since 2008. In 2014, Comerica received a disclosure score of 93 and made CDP's Performance Disclosure Leadership Index for the second consecutive year, based on our GHG emissions reduction performance. Please see our [2015 CDP Response](#) for more information on our strategy and recent progress in addressing climate change risks and opportunities.

Managing Operational Impacts

We assess our environmental operational performance based on our own real estate footprint as well as our purchased goods and services. Key operational indicators are GHG emissions, waste, paper, and water and we also work to reduce the impacts associated with our purchases. This involves routinely collaborating with our service vendors to find ways to be more efficient, for example, by deploying energy-conserving equipment and developing best practices for facilities operation. Our focus on sustainability goals help us to strive for continual progress while remaining agile in a changing and competitive business environment.

Each quarter, we complete a detailed Key Performance Indicator (KPI) Report. This tracks all utility-related water and energy use along with data for other sustainability-related activities we report on, including corporate travel, paper, waste, refrigerants, recycled materials, and various other value chain activities. Trends are analyzed and reported to our Corporate Real Estate leadership, the Chief Information Officer, the Corporate Sustainability Office, and the Sustainability Council. Key statistics are also relayed to the Facilities Management and Engineering teams to keep them informed of their facilities' performance and company progress toward our environmental goals.

Sustainability Goals Performance

In 2014, we developed a scientific strategy for setting new sustainability goals (as described in [Approach to Sustainability](#)). This approach incorporates projected changes in the occupied square footage of our existing real estate, ongoing projects that will deliver efficiencies, and

planned real estate expansion activities. We developed strategies and 2020 goals for our four focus areas: GHG emissions, waste, water, and paper. The following table shows our performance to date measured against these goals.

| Comerica's 2020 Sustainability Goals | | | |
|---|--|---|--|
| Reduction in real estate greenhouse gas emissions (2012-2020) | Reduction in water usage in metered facilities (2012-2020) | Reduction in waste sent to landfill (2012-2020) | Reduction in office copy paper consumption (2012-2020) |
| 20% | 30% | 20% | 50% |
| Performance Against Goals (2014 vs. 2012) | | | |
| -10.3% | -22.5% | -16.9% | -18.9% |

Impact Topic Energy & Greenhouse Gas Emissions

Reducing our energy use and associated GHG emissions brings multiple environmental and business benefits. We believe higher performing buildings that result from operational efficiencies help us to create a more desirable workplace, with benefits including improved employee retention, customer appeal, and bottom line profitability. In 2014, we made significant progress in reducing our energy use and GHG emissions while carefully managing our financial resources to maximize the impact of our investments.

Energy Management

Energy is one of Comerica's largest corporate operating expenses. Since the majority of our direct GHG emissions result from energy used to operate our buildings, shrinking our GHG emissions footprint depends upon reducing the energy we consume. In 2012, we introduced a systematic approach to identify energy improvement opportunities company-wide and to review operational practices for enhanced energy efficiency.

We seek out new ways to green our facilities by deploying methods that incorporate a focus on people, process and technology. Some of the key highlights from this approach achieved during 2014 include:

- Completion of comprehensive energy audits for 19 facilities which informed our updated GHG emissions reduction goal strategy
- Completion of BOMA Energy Efficiency Program (BEEP) training by our Facility Management Team and Corporate Real Estate Leadership with several individuals also receiving LEED GA certification
- Development of an Energy and Sustainability Playbook that details the processes that we engage for utility consumption and expense management, sustainability reporting, water conservation, and **Collaboration** with cross-functional teams
- Development of equipment standards and recommendations for new or replacement equipment to serve as a guide to efficient equipment selection
- Removal of approximately 72,897 square feet (-1.3 percent) of occupied real estate space and an additional 9,461 square feet (4.8 percent) sublet to other companies

While we are not currently seeking Leadership in Energy & Environmental Design (LEED) certification for our facilities, we do incorporate green building aspects, where appropriate and affordable, into our new building and retrofit projects. During 2014, we focused on lower cost improvements due to regulatory compliance pressures on our real estate capital project budgets. Activities included replacing out-of-service lights with light-emitting diode (LED) bulbs, installing insulation on water heaters, reconfiguring building management systems and installing timers on electric water heaters to follow building occupancy schedules, replacing outdated thermostats with programmable smart models, and recommissioning existing equipment to boost performance.

Data Center Efficiencies

Comerica's Mission Control Team, which exists across key departments, manages our efforts to improve operating efficiencies at our data centers, which are higher energy users. In 2014, this team of leaders from Information Security, Facilities Management, Critical Environments, Corporate Real Estate, Energy & Sustainability, and Project Management, created a Data Center Readiness Transformation Plan — an action plan for transformation to the "Data Center of the Future." This five-year blueprint for delivering the "Data Center of the Future" laid out management protocols for infrastructure, equipment, change controls, and operational aspects across our data centers, as well as capital improvements and investment projects through 2017.

Performance

In 2014, Comerica reduced overall real estate energy consumption by 1,767 MegaWatt-hours (MWh) compared to 2013.

2014 Real Estate Energy Consumption

| Energy Category | Energy Consumed (MWh) | % Change (2014 vs. 2013) |
|-------------------------------|-----------------------|--------------------------|
| Electricity (Metered Space) | 79,013 | -2.1% |
| Electricity (Unmetered Space) | 23,885 | -5.6% |
| Natural Gas | 38,963 | 16.7% |
| Diesel Fuel | 5 | -99.2% |
| Steam | 1,131 | -76.3% |
| Chilled Water | 19 | 18.8% |

Sustainability Highlight: Showcasing Greener Building in Detroit

In 2014, Comerica's Michigan market headquarters in downtown Detroit, won a prestigious award for green renovation. The Detroit District of the Building Owners and Managers Association (BOMA) recognized the energy efficiency and capital improvements we made to the Comerica Banking Center with an award for The Outstanding Building of the Year (TOBY) for Operational Excellence of a Renovated Building. High efficiency lighting and heating systems, and improved operational controls and equipment scheduling, together raised the facility's Energy Star score from 77 to 86. Replacing district steam heating with high efficiency natural gas boilers reduced energy spend by over \$250,000 from 2012 to 2014. The new heating system also removed over 1,100 metric tons of CO₂ equivalent (MtCO₂e) emissions from our carbon footprint, compared to 2012, providing a significant lift toward achieving our new GHG emissions reduction goal.



Greenhouse Gas Emissions Management

As part of our longstanding commitment to reducing our carbon footprint, we track and publicly report on our GHG emissions. For more detailed information on Comerica's GHG emissions, please refer to our [2015 CDP Response](#) or the [Key Statistics Table](#) in this report.

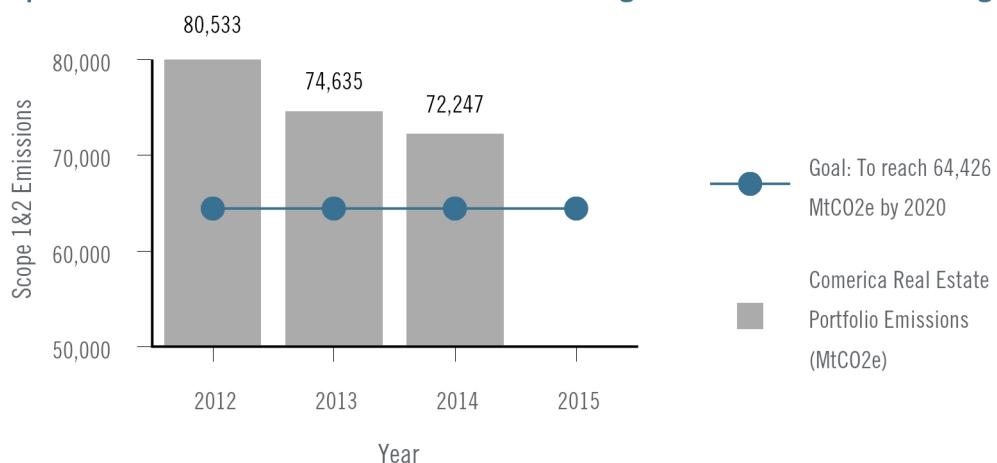
Real Estate Emissions (Scope 1 & 2)

At the end of 2013, we reduced our real estate GHG emissions by 18.9 percent from 2008 levels, surpassing our goal of a 15 percent reduction by 2014. This success prompted us to evaluate and set new goals to reduce our climate impact. In 2014, we set a goal to reduce real estate-related GHG emissions by 20 percent by the end of 2020, from 2012 levels. This target incorporates our entire real estate portfolio, including the acquisition of Sterling Bancshares in 2011.

Through 2014, we reduced our real estate GHG emissions by 8,286 MtCO₂e over our 2012 baseline total of 80,533 MtCO₂e - a 10.3 percent reduction in Scope 1&2 real estate emissions.

| Scope 1 and 2 Real Estate GHG Emissions | | | |
|--|--------|--------|--------------------------|
| Breakdown by Scope | 2013 | 2014 | % Change (2014 vs. 2013) |
| Scope 1 Real Estate Emissions (diesel, natural gas, refrigerants)- MtCO ₂ e | 6,815 | 7,570 | 11.1% |
| Scope 2 Real Estate (electricity–metered and unmetered, steam, and chilled water)- MtCO ₂ e | 67,820 | 64,677 | -4.6% |

Scope 1 & 2 Real Estate GHG Emissions Performance Against 2020 GHG Reduction Target



Travel Emissions (Scope 1)

Our Scope 1 travel emissions decreased by 20.8 percent (953 MtCO₂e in 2014 vs. 1,204 MtCO₂e in 2013) due to reduced use of the corporate jet for company purposes. Reductions were also related to the transfer of 272 MtCO₂e of corporate jet emissions to the Scope 3 emissions category associated with third parties who sublease the corporate jet (not for Comerica-related projects or for personal use by Comerica employees).

Value Chain Emissions (Scope 3)

In 2014, we reported on eight of the 15 Greenhouse Gas Protocol's *Corporate Value Chain (Scope 3) Accounting and Reporting Standard* categories for Scope 3 emissions, including for products and services we purchase, upstream product and service transportation, business travel, waste to landfill, and employee commuting. In 2014, our Scope 3 emissions fell from the previous year in all but one of these categories, see graph below. This progress was due mainly to efficiency improvements and fewer purchases of key products and capital goods. For more details on our Scope 3 emissions, see Section 14 of Comerica's [2015 CDP Response](#) or the [Key Statistics Table](#) in this report.

| 2014 Scope 3 Emissions | | | |
|--|----------------------------|----------------------------|--------------------------|
| Scope 3 Categories | 2013 (MtCO ₂ e) | 2014 (MtCO ₂ e) | % Change (2014 vs. 2013) |
| Products and services | 3,098 | 2,838 | -8.4% |
| Furniture | 463 | 148 | -68.0% |
| Electricity transmission/distribution loss emissions | 4,442 | 4,302 | -3.2% |
| Upstream transportation/distribution | 1,539 | 1,039 | -32.5% |
| Scope 3 lifecycle emissions associated with landfilled mixed solid waste | 2,033 | 914 | -55.0% |

2014 Scope 3 Emissions

| Scope 3 Categories | 2013 (MtCO ₂ e) | 2014 (MtCO ₂ e) | % Change (2014 vs. 2013) |
|---|----------------------------|----------------------------|--------------------------|
| Employee business travel by air and car | 4,791 | 4,147 | -13.4% |
| Employee commuting emissions | 35,864 | 33,200 | -7.4% |
| Downstream leased assets | 1,508 | 1,869 | 23.9% |
| Other downstream- subleased corporate jet | NA | 272 | NA |
| Total Scope 3 emissions | 53,738 | 48,729 | -9.3% |

Impact Topic Waste

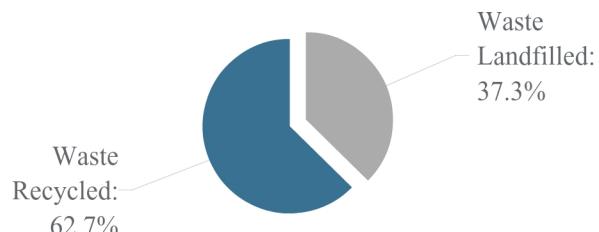
Waste Management

Managing our waste is not only good stewardship, it also directly benefits the company through reduced waste collection and disposal costs. Comerica has three main solid waste streams — electronics, paper, and general office waste — and we are committed to recycling and reducing operational waste and to monitoring our waste streams so we can work to reduce the volume of materials we purchase and discard. In 2012, Comerica changed the method of managing waste disposal at their facilities and began a new national contract with a single waste disposal vendor. The national contract established a standard of practice for waste handling and provided the company valuable data from their portfolio of managed facilities as to the type and schedule of material collection. It also enabled the first-ever calculation of a waste baseline for the company.

Performance

We set a new goal in 2014 to reduce the amount of waste we send to landfills by 20 percent by 2020 over our 2012 baseline. In 2014, we reduced the employee waste sent to the landfill by 16.9 percent compared to 2012. Overall, we increased the percentage of waste diverted from the landfill in 2014 by 3.6 percent compared to 2013.

2014 Waste Diverted from Landfill



The amount office paper and employee waste we sent for recycling both increased slightly compared to 2013. Comerica's general waste streams are considered non-hazardous. Some of our capital projects involve demolition-generated asbestos containing materials, which are handled in accordance with federal and local regulatory guidelines.

| Waste Stream | 2013 Waste Generated (short tons) | 2014 Waste Generated (short tons) | % Change 2014-2013 |
|---------------------------------|--|--|---------------------------|
| Landfilled Waste | 2,067.2 | 1,732.5 | -16.2% |
| Recycled Employee Waste | 141.3 | 154.2 | 9.13% |
| Office Paper Waste | 2,680.0 | 2,684.4 | 0.2% |
| Electronic Waste | 163.1 | 66.5 | -59.2% |
| Light Bulbs | 4.1 | 2.2 | -46.3% |
| Batteries | 1.0 | 0.8 | -20.0% |
| Cardboard bailer (CBC location) | — | 6.7 | NA |
| Total | 5,056.7 | 4,647.4 | -8.1% |

Meeting Our 2020 Goal

Our waste reduction goal is focused on waste generated by employees that is sent to the landfill (such as non-recyclable packaging and employee wastes that are collected in office trash cans). Our strategy is to continue auditing facilities in order to identify sites where we can reduce the size of the waste-to-landfill containers, reduce the frequency of landfill container collection and/or increase employee recycling programs. In 2014, we expanded this waste optimization program to encompass retail locations in Michigan, Texas, Arizona, and California where our corporate vendor has control over the pickup frequency. The Comerica Bank Center in downtown Detroit also deployed a new cardboard compactor, which captured and recycled 6.7 tons of cardboard in 2014.

While our waste optimization program continues to deliver results, the opportunities for reducing waste to landfill are shrinking. Our retail banking centers, which generate very little solid waste and were therefore easiest to optimize, were brought into the program in 2014. As well, adjusting waste container size or collection frequency without creating nuisance issues will be more difficult at the multi-tenant sites that generate larger amounts of waste and need more frequent collection schedules. Finally, our implementation of recycling at smaller locations is limited because of the cost involved and the waste container siting requirements of municipal or development owners.

Impact Topic **Paper**

Paper is one of Comerica's main consumable resources. We track paper purchases across the bank, including office copy papers, statement papers, envelopes, business cards, and marketing papers. Our paper purchase data is used as a proxy for paper consumption. Our paper vendors provide us with the total quantity of paper purchased by paper type, recycled content, and papers certified to the Forest Stewardship Council (FSC) standard. Paper quantities and environmental attribute trends are measured on a quarterly basis so that we can make changes, if needed, to our paper purchase procedures to meet our reduction and environmental attribute goals.

We have set a target to reduce office copy paper consumption by 50 percent by 2020 compared to a baseline year of 2012. In 2014, we also set an office copy paper standard of 30 percent post-consumed recycled (PCR) content and FSC-certified paper. Recycled content paper is also used in other applications, where possible, based on paper attribute needs and cost considerations.

Performance

In 2014, we reduced our total paper consumption, including office and marketing papers, by 11.4 percent compared to 2013. For the complete breakdown of our 2014 paper quantity, recycled content, and intensity metrics, please see the [Key Statistics Table](#).

Progress by Paper Type

| 7% | 43% | 23% | 96% | 98% |
|---|---|--|---|---|
| Reduction in office copy paper use (vs. 2013) | Reduction in office copy paper consumption since tracking started in 2008 | Increase of marketing paper purchases (vs. 2013) | Percentage of office copy paper purchases that met our PCR standard in 2014 | Percentage of office copy paper purchases that met our FSC certification standard in 2014 |

Sustainability Highlight: Reducing Unnecessary Printing One Department at a Time

We engage colleagues in awareness-building programs to help avoid unnecessary printing, an effective strategy that has enabled us to continually reduce paper purchases and office printing supplies. For example, in 12 months during 2013-2014, Comerica's Transaction Processing Department discontinued printing hard copies of 4,366 internal reports, which is expected to reduce the printing of approximately 2.7 million pages annually.

Impact Topic Water Stewardship

We operate in water-stressed regions of Texas, Arizona, and California so it is important for us to implement water conservation measures and routinely track and monitor our water consumption and costs. We have committed to reducing water consumption at Comerica utility metered locations by 30 percent by 2020 over a 2012 baseline.

In 2014, we modified our irrigation system watering schedules in California to comply with local utility requirements and inspected these systems to confirm water was not being wasted. During the year, we made significant progress on saving water through the use of Weathermatic irrigation controls systems, which expanded from five pilot sites in Texas to an additional 11 locations, including new sites in Arizona and Michigan. The combined water savings exceeded 4.5 million gallons in 2014. We continue to evaluate our properties for smart irrigation technology or conversion to landscaping that has low water needs. In 2014, we also added language to our regional landscaping contracts to further promote regular inspections of irrigation systems and site-tailored watering schedules based on plant needs, soil type, and topography.

Performance

Comerica's drinking water is sourced through local water utilities. A few locations in Michigan are also equipped with on-site water wells that provide water for landscape irrigation purposes. There is also one on-site well, not currently in use, at one of our Texas locations which is used as back-up emergency water for the building's HVAC system.

In 2014, utility-supplied water consumption at these sites totaled 92,403,406 gallons — down 26,878,768 gallons (or 22.5 percent) from 2012. Much of this progress was due to the smart irrigation projects and California drought response activities. In Michigan, we recorded water savings due to wetter weather conditions and the conversion of two downtown Detroit facilities from steam to high efficiency natural gas boilers. The conversion to natural gas at these locations eliminated the need for steam quench water, reducing their combined water usage by nearly 20 percent (2.14 million gallons).

Comerica was subject to a small fine from a local municipality in 2014 for watering during unauthorized times. The situation was caused by vandalism to our irrigation control unit, which resulted in water being applied during times other than the once-per-week schedule. Our response was to better secure the control unit at this location, and preemptively at other Comerica locations.

To engage our employees, we created awareness of water conservation practices in the home and workplace through our internal communications and signage inside our facilities. We also held special training sessions with our Facilities Management Team, alerting them to monitor for water leak or water waste situations at their managed facilities.

Sustainability Highlight: Responding to Drought Emergency

In 2014, California Governor Jerry Brown issued a state of emergency due to the severe drought conditions, and the California State Water Board required communities to reduce water consumption by 20 percent. In response, many communities modified approved landscape watering schedules and instituted fines for non-compliance.

These new requirements were rolled out at different times during the year and varied from community to community. Given our 50 locations across California where we have the ability to control water usage, this created a significant management effort for Comerica. We responded proactively, creating new work orders for our landscape vendors, requiring immediate inspection of irrigation systems to identify malfunctions, leaks, or run-off situations. We also required vendors to configure irrigation control schedules to comply with changing site-specific water utility requirements, and implemented changes to avoid over-spray or run-off and make the most efficient use of water for landscaping. For example, new irrigation controls were installed in several locations, replacing outdated technology. In California, we reduced our water consumption by 4.34 percent or 207,532 gallons in 2014. The drought limitations and irrigation restrictions did not take effect until after mid-year 2014. After the restrictions were implemented, we lowered our quarterly water consumption in California by 39 percent compared to the same time in 2013 (Q4 2014 vs. Q4 2013).

"With the ongoing drought conditions across California, we've taken steps to reduce our water consumption. It is another way we live Comerica's Core Values by demonstrating our sustainability commitment in our host communities."

- Judith S. Love, President, California Market, Comerica Bank



Environmentally Responsible Procurement

Buying environmentally preferable products helps reduce our operations' impact on natural resources. Our Green Procurement Work Group oversees our Environmentally Preferred Procurement (EPP) program, which covers common purchases ranging from furniture and carpeting to computer equipment and office supplies. The Work Group includes members of our procurement team and Corporate Sustainability Office as well as two key supplier partners — Accenture management consultancy and CBRE real estate services. Launched in 2010, the Work Group helps to provide colleagues with best practices related to EPP, and provides purchasing managers with tools to help increase the purchase of environmentally preferred products, where possible.

Comerica also worked with several key suppliers in 2014 to quantify the environmental impacts of our purchases, including the following focus areas:

- The recycled content of the carpet products,
- The quantity of computer purchases that meet the IEEE Electronic Product Environmental Assessment Tool (EPEAT) ratings, which consider the entire lifecycle of the computer,
- The quantity of furniture purchases that receive the Business and Institutional Furniture Sustainability Standard (BIFMA) level® certification, which considers materials used, energy and climate impact, human and ecosystem impacts, and social responsibility, and
- Office supply purchases that are rated "green" on Office Depot's GreenerOffice™ sustainability scale.

EPP Performance

| Carpeting | Computers | Furniture | Office Supplies |
|--|---|--|--|
| 99% of carpet purchases contained recycled content in 2014 | 100% of computers purchased carried the EPEAT Gold Rating in 2014 | 87% of furniture purchases were level® certified in 2014 (compared to 89% in 2013) | 57% of office supplies purchases were rated as "green" by Office Depot in 2014 |

Sustainability Highlight: Environmentally Responsible Procurement Recognition



Comerica was recognized as a Green Award Winner in 2014 by *Supply & Demand Chain Executive* magazine in its 7th Annual Green Supply Chain Awards.

Please refer to the [Supply Chain](#) section of this report for information on environmental screening of our significant suppliers.

Supporting Environmentally Beneficial Companies & Projects

Impact Topic Green Lending

Beyond our operational footprint, we support sustainable outcomes through our lending; a practice that also grows our business. In order to do so, we look to lend to companies who promote sustainability as well as projects that promote resource minimization. This includes providing loans that help clients improve their energy efficiency, build greener facilities, and improve their recycling rates.

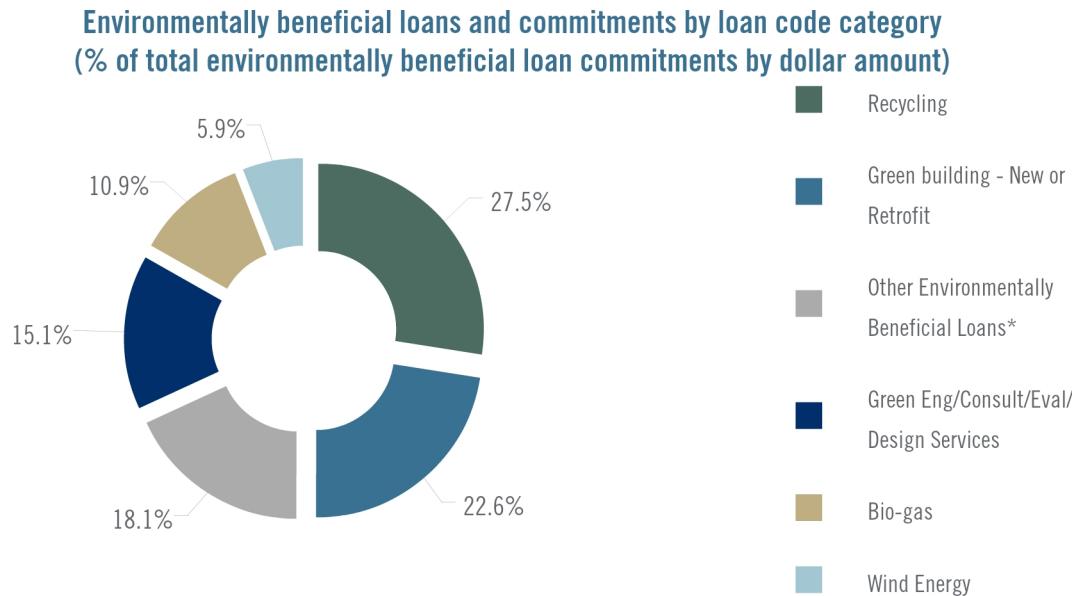
Performance

We track our green loans to determine whether we are making progress on new lending opportunities to environmentally-focused companies or projects. In 2014, our focus was on employee training following a 25 percent reduction in green loans and commitments coded as environmentally beneficial from 2012 to 2013. Based on our analysis, this decline resulted from:

- Changes in lines of business (some areas showed growth in environmentally beneficial lending while others showed declines).
- Employees forgetting to add the non-required environmentally beneficial loan codes to loan documents, which means they were not tracked as green loans.
- Failure to reapply environmentally beneficial loan codes when loans were restructured or renewed.

The Corporate Sustainability Office conducted a corporate-wide environmentally beneficial lending training for loan analysts and lending assistants in 2014, as well as a Southern California lender training on coding such loans. At year end 2014, we recorded a 25 percent increase in green loans and commitments coded within the tracking system over 2013. Increases were based on additional customers, increased business activity, and improved loan coding.

In 2014, Comerica's portfolio of environmentally beneficial loans and commitments totaled approximately \$975 million, lent to 105 customers, compared to \$780 million in 2013. Of this total, 50.1 percent went to support recycling projects and green buildings. Many of these loans were issued through our Environmental Services and Commercial Real Estate Departments. Additional business areas across the company engage in environmentally beneficial lending, including Technology and Life Sciences, Corporate Banking, Small Business Administration, and Business Banking.



* The "Other Environmentally Beneficial Loans" category in this chart includes the following environmentally beneficial loan codes (each represents less than 6% of Comerica's total environmentally beneficial loan commitments): Other Green Products & Services not already addressed (5.9%), Brownfield Redevelopment (3.6%), Solar Energy (3.4%), Vehicle Electrification/Advanced Battery/Fuel Cell (2.1%), Energy Efficiency (1.6%), Pollution Control (1.0%), and Bio-Fuels (0.4%). Data as of 12/31/14.

Sustainability Highlight: Supporting Businesses Operating in the Green Economy

Electronics Recyclers International, Inc. (ERI), a long-term Comerica customer, supports the greening economy. ERI works to safely de-manufacture and recycle electronic waste to keep the waste out of landfills and out of unsafe global e-waste dumping grounds. The company operates the largest e-waste shredders in the world, and was also the first electronic recycler to be dual certified in R2 and BAN e-Steward certifications. ERI processes over 275 million pounds of electronic waste annually at eight locations in the United States. In addition, ERI's commitment to sustainability extends far beyond their core business and includes Chairman and CEO John Shegerian's hosting of the Green Is Good radio show.



“And just like the support that we provide to maintaining a cleaner environment, Comerica supports our company by meeting our financing needs to grow our business and by acting as a trusted advisor to me and my company.”

- John S. Shegerian, Chairman and CEO of ERI

Sustainability Communication & Involvement

Our sustainability efforts —from making green loans to recycling office supplies — rely on the enthusiasm and commitment of our colleagues. Knowing this, we engage and educate colleagues on sustainability through corporate intranet communications and discussion boards, green office teams, work groups, and training. New employees are required to complete mandatory sustainability awareness training. In 2014, 99.6 percent (1,189) of new hires completed the course. To take this training to the next level, our Service Company Sustainability Committee is piloting a Masters of Sustainability Awareness program in 2015. This will take a similar approach to Comerica's acclaimed Masters of Diversity Awareness program. For more information, see [Diversity & Inclusion](#) under the Employees section.

Green Office Teams

Twelve active green office teams, made up of dedicated volunteers and based at our larger office buildings, organize year-round sustainability awareness and community **Involvement** initiatives. In 2014, our teams coordinated and participated in 24 office and community-based events, including environmental volunteering projects, winter clothing drives, cell phone, and eyeglass donations, and lunch and learn events.

Making a Difference: One Event at a Time



In Fall 2014, Comerica's Livonia Operations Center Green Office Team collected winter clothing to support the Capuchin Soup Kitchen in Detroit, Michigan while also supporting the reuse of clothing that still has a useful life. Their efforts resulted in the donation of over 145 winter coats and 6 bags of winter accessories to the Capuchin Soup Kitchen before the start of the cold Michigan weather.



Additionally, our Auburn Hills Operations Center green office team conducts two environmental cleanup events twice a year: a roadside cleanup and a cleanup of the Clinton River which flows past Comerica's Auburn Hills campus.



“We can only make a marked difference when our colleagues support and participate in sustainability initiatives at Comerica. Our green office teams continue to represent a great way for colleagues to engage in sustainability efforts that are important to them and to Comerica.”

- Kristin M. Blosier, Vice President, Senior Sustainability Officer & Green Office Team Facilitator, Comerica Incorporated

COMMUNITY

When the communities where we operate are successful, so is Comerica. Understanding and responding to the changing needs of the places where we live and work is essential to our business. To help us do so, we collaborate with community-based partners in a wide range of ways, including through our Community Reinvestment Act (CRA) lending, affordable housing tax credit investments, and microenterprise loan funds, which support economic development. We also contribute through philanthropic projects and employee volunteer activities.

| | |
|-----------------|---|
| 2014 PROGRESS | Supported small businesses through funding of 29 MicroEnterprise Loan Funds |
| | Closed \$73.6 million in Low-Income Housing Tax Credit investment deals |
| | Gave approximately \$8.8 Million to over 2,000 charitable organizations |
| | Donated over 75,000 employee volunteer hours to non-profit organizations |
| 2014 CHALLENGES | Low interest rate environment and expense controls limited outreach and investment activities |
| | Our most recent CRA rating (based on 2010-2011 data) was primarily affected by the economic conditions during those years and is not indicative of current CRA lending levels, which are significantly higher |
| | Getting employees to record their volunteer hours for the work that they do within their communities |

Impact Topic **Community Reinvestment & Development**

Our community reinvestment strategy is designed to support the viability and wellbeing of the communities in which we operate. Our main focus areas are small business and community development lending, investments in tax credits for affordable housing, and financial literacy education.

Comerica & the Community Reinvestment Act

The Community Reinvestment Act (CRA) encourages financial institutions to address the needs of their entire communities, including those in low- and moderate-income areas. We have a dedicated team of 10 CRA market managers who are responsible for working with our community partners to support the needs of the markets where we operate. These market managers also look for opportunities where Comerica can invest in these efforts and provide targeted products and services.

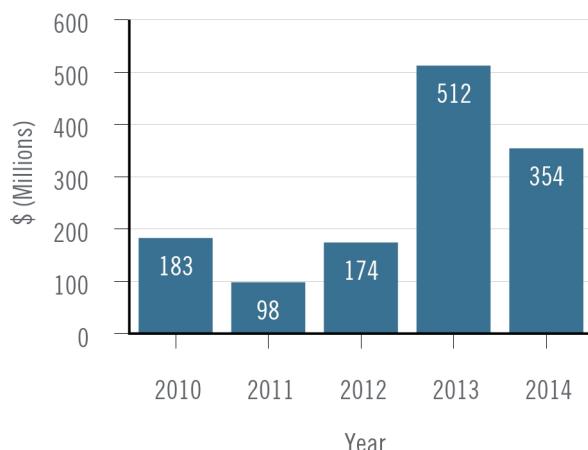
In 2014, we expanded our strategies to ensure we provide sufficient CRA-related outreach, including financial literacy education, across our 36 CRA assessment areas. We developed CRA lending goals for each assessment area, overseen and monitored by CRA committees. In addition, our Community Development Advisory Councils in Michigan, California, and Texas continued to advise on how our products and services can support low- and moderate-income communities. Each council is made up of eight to 10 key community partners that represent the diverse populations and interests in our key markets.

To satisfy CRA regulations that require banks to meet a broad spectrum of needs, Comerica seeks out investments in affordable housing and other social service needs, including day care facilities. We also offer products that benefit low- and moderate-income individuals, including our Access Checking Account, On the Job Banking, Comerica Convenience Card, Secured Credit Card, Independence Card, and Direct Express.

Performance

The economy continued to improve in 2014, providing us with more community and economic development opportunities. In 2014, Comerica originated 111 Community Development Loans totaling approximately \$354 million, compared with \$512 million in 2013. The decline in the 2014 loan amount was primarily due to larger deal opportunities that were available to Comerica in 2013, but not in 2014. Even so, Comerica's 2014 community development loan amount still indicates a significant investment within our communities.

Community Development Loans



Comerica received a "Satisfactory" rating in our most recent CRA examination. This rating covered the 2010-2011 year, but was not received from the Federal Reserve until January 2015 and does not reflect our current levels of CRA engagement. This rating was primarily related to:

1. The decrease in community development loans in 2010 and 2011, which was related to the economic decline in two of our key markets: Michigan and California. The volume of loans originated during the current exam cycle (2012-2014) is significantly larger than the prior exam cycle (2010-2011).
2. A decline in our Community Development (CD) Services activities. To address the CD Service decline, we have provided training in our markets regarding the need to participate in CD Services. We have also partnered with third party financial literacy providers to teach financial literacy on behalf of Comerica in markets where we have fewer employees, or to help us create one day events in which Comerica colleagues can more easily participate. This approach has resulted in significant increases in CD Services in our markets.

We require new CRA compliance staff to take our in-house CRA training, and provide additional training as needed in response to regulatory or operational changes. We also participate in peer bank meetings across our markets to discuss best practices in complying with CRA regulations, including community development.

Community Reinvestment Recognition

| | | | |
|---|---|--|--|
| McLaren Oakland Foundation-Tribute to Excellence Award for outstanding commitment to the Pontiac community | Pink Angel award from the Sister's Network in recognition of support of the organization and their efforts to help women with breast cancer awareness and financial support | Circle of Friends Award for the NAACP's San Jose/Silicon Valley branch's 61st Annual Freedom & Friendship Gala | Partnership Award from Children's Harbor for the bank's continuing support of educational programs, including financial education, for the residents of their facilities |
| Christmas In Action-Appreciation Award for continued commitment of improving the quality of life for low income senior citizens in the Northend community | | | |

Community Reinvestment Recognition (Continued)

| | | |
|--|---|--|
| Winning Futures-2014 Cupp-Hamilton Scholarship Award for support of the organization and their contribution to support scholarships for low-income youth | 2014 TWEF International & Financial Leadership Award - provided by the Texas Women's Empowerment Foundation in recognition for Comerica's leadership in the Houston community | The Door Openers Award from Payne Pulliam School of Trade and Commerce (a woman and minority-owned trade school) for our ongoing support of the organization and its mission |
| River Rouge School District-Appreciation Award for our ongoing commitment to financial literacy within the school district, as well as our support for the Celebrity All-Star Giveback | Accion San Diego award for long-term service and financial commitment to the organization | Emmanuel House for Veterans- Appreciation Award for support of their Veterans Transitional Housing program |

Investing in Neighborhood Revitalization

Comerica invests in making well constructed and safe housing available to residents of low- and moderate-income neighborhoods in our markets. Using federal financial incentives, we make investments that help improve the housing stock while keeping it affordable. These projects bring many added benefits, including construction jobs and more visually appealing and desirable communities, as well as helping to attract new residents and businesses.

Given the strong competition within the financial services industry, it is a challenge to find tax credit investments that meet our underwriting standards and are located in areas we believe would most benefit from our investment. Nevertheless, in 2014, we closed \$73.6 million in Low-Income Housing Tax Credit investment deals, a slight decrease over 2013 closed deals totaling \$74.3 million. In addition, approximately 10 percent of the projects that benefited from Comerica's tax credit investments in 2014 are Leadership in Energy & Environmental Design (LEED) certified housing projects.

Supporting Small Businesses through MicroEnterprise Loan Funds

Small businesses and entrepreneurs are the backbone of local economies and Comerica seeks to provide loan capital to microenterprise loan funds where we operate. Each bank receives CRA credit for its pro rata share of loans originated via these multi bank microenterprise loan funds. In 2014, we supported 29 such funds, with Comerica's pro rata share of loans originated to small businesses totaling almost \$2 million.

We also look for opportunities to fund organizations that provide technical assistance to small business, such as financial literacy education. For more information on Comerica's support of financial literacy, please see the Impact topic: Customer Education and Financial Literacy under [Understanding and Supporting Our Customers](#).

Impact Topic **Philanthropy**

Giving back to our communities reflects Comerica's culture and our Core Values of **Collaboration** and **Involvement**. Comerica Bank and the Comerica Charitable Foundation are committed to supporting charitable organizations within our key markets with both financial and volunteer support. We believe this approach strengthens both our company and our communities, and generates a strong and positive image in the locations where we do business.

Giving Goals and Priorities

Comerica supports philanthropic efforts that complement our commitment to community reinvestment, target impact issues that are important to the company and our communities, address diversity needs of each community, and create pride and loyalty for Comerica colleagues. The Comerica Charitable Foundation awards grants to nonprofit organizations based in our markets whose missions align with one or more of our giving priorities.

Our key giving priorities largely align with our overall business approach and support our strategic direction as a financial services provider. They include:

| Key Giving Priorities | | | | |
|--|---|--|--|--|
| Economic self-sufficiency | Neighborhood revitalization | Education | Access to health care | Diversity and inclusion |
| We support organizations that offer financial literacy programs, support job creation and retention, provide transitional and supportive housing, and/or deliver small business training and development | We fund charitable organizations that provide services, which support neighborhood growth and revitalization, affordable housing, and neighborhood business development | We support organizations that deliver financial literacy or education programs to children and adults, as well as scholarship programs for deserving students studying business, finance, science, technology, engineering and mathematics (STEM), and other growth industry-related disciplines | We help fund health care access programs for uninsured and under-insured markets | We promote programs that target a broad audience on the importance of diversity and inclusion to communities |

Comerica has processes and policies in place to ensure that we review charitable requests against our giving priorities, and that we support charitable organizations within our markets in a fair manner.

Each of our footprint markets —Texas, Arizona, California, Florida, and Michigan — has a Market Contributions Committee, chaired by the Market President and comprised of business unit and other department representatives. The committee meetings, which are planned by the Contributions Manager in each market, meet every quarter and ensure that charitable policies and procedures are followed. Overall corporate giving budgets are reviewed and approved by the National Contributions Committee, made up of Comerica's Chairman and CEO, President, and other senior executives, which also meets every three months. This committee also reviews recent charitable grants and other matters relating to Comerica's charitable program. The Foundation's board meets on an annual basis. Our Corporate Contributions Department undergoes an extensive internal audit every three years to ensure its activities align with our policies and procedures.

Performance

In 2014, Comerica and the Comerica Charitable Foundation together provided financial support worth \$8.75 million to over 2,000 charitable organizations, a 4.3% percent increase over the 2013 amount of \$8.39 million. The biggest recipient was the corporate-wide United Way campaign, which received nearly \$3 million in combined funding from Comerica colleagues, the Bank, and the Foundation in 2014.

Additional highlights included:

- A \$500,000, five-year grant (2012-2016), with \$100,000 contributed in 2014, to the Dallas Momentum Foundation's Blueprint for Prosperity campaign.
- A \$1 million, five-year grant (2014-2018), with \$200,000 contributed in 2014, to the Foundation for Detroit's Future, in support of the city government's "Grand Bargain" bankruptcy recovery plan.
- \$50,000 for the Dallas market's Crystal Charity Ball. This is the eighth consecutive year we have supported this event, which raises funds for children's welfare organizations in Dallas County.

Sustainability Highlight: Supporting New Business in Detroit

Comerica is proud to support the development and success of new retail businesses in Detroit, aiding the city's revival. One way that we do this is through the Comerica Hatch Detroit contest, where contestants submit their plans for new brick and mortar retail businesses. The annual contest winner receives a \$50,000 prize in addition to legal, accounting, marketing, and information technology support. To promote the contest's success, Comerica also provides in-kind services to Hatch Detroit, including public relations and advertising support.

For the third consecutive year, Comerica has provided the \$50,000 prize to the contest winner. In 2014, the prize was awarded to Sister Pie, a bakery serving seasonal pies and baked goods that uses locally sourced ingredients. The prize provided seed money to help Sister Pie build a new store, which opened in April 2015, in Detroit's West Village.



“Sister Pie strives to be a triple-bottom-line business, maintaining a commitment to employees, the local economy, and the environment. By selecting local and seasonal ingredients, we support our mission to celebrate the seasons through pie; to provide consistently delicious, thoughtful, and inventive food; and to foster a welcoming environment for employees and customers through transparency, community engagement, and education.”

- Lisa Ludwinski, Sister Pie founder

Impact Topic **Volunteerism**

Involvement is a Core Value of Comerica, and we recognize that our success is intertwined with the prosperity of the communities we serve. Our commitment to communities is centered around our colleagues and we encourage them to share their time and expertise in order to support the communities in which we operate.

We strive to be a community leader in our key markets through colleague volunteering and board participation. Each primary market has a Local Community **Involvement** Coordinator, who works with our National Civic Affairs Manager to ensure that volunteering goals are met, and that we follow best practices. We also encourage senior managers to participate on community nonprofit boards.

409

Number of community nonprofit boards on which Comerica colleagues served in 2014

Performance

Comerica's employee volunteer program provides opportunities for colleagues to give back to the community through their time and talent. We set annual goals for volunteer hours in each community where we operate, and managers encourage colleagues to help meet that goal and lead by example. Last year, our company-wide goal was 72,000 employee volunteer hours — roughly equivalent to eight hours per employee. In 2014, we exceeded that goal by more than 1,900 employee volunteer hours.

2014 Employee Volunteer Numbers

| | | |
|--------|------------|--|
| 73,970 | 2,543 | \$1.7 million |
| Hours | Volunteers | Approximate worth of employee volunteer time |

Donate 8

In 2011, we launched the Donate 8 initiative which challenged colleagues to spend eight hours or more a year on community service activities. In order to encourage colleagues to formally record their community volunteer hours, we updated the program in 2014 to incentivize participation. Colleagues who formally recorded at least eight hours of personal volunteer time in their communities were entered into a drawing to win lunch with a Comerica executive. In total, approximately 31 percent of our employees recorded volunteer hours in 2014, of whom over half gave eight hours or more of their time.

Comerica's National Day of Service



During Comerica's 7th annual National Day of Service in September 2014, approximately 540 Comerica colleagues took part in 55 service projects, donating over 2,160 hours to local nonprofits. Projects ranged from working in soup kitchens and food banks, to supporting youth programs and building homes with Habitat for Humanity. Leading by example, 35 senior officers also participated in these activities.

Sustainability Highlight: Educating Students on Financial Responsibility

Comerica implemented our Money \$ense Program, a financial education course designed to empower students with the essential skills needed to make sound financial decisions. We partnered with leading education technology company EverFi, Inc., to bring this interactive, web-based financial management program to 19 Arizona schools for the 2014-2015 school year. As of June 2015, the financial education curriculum program had been completed by nearly 1,000 students, with more than 3,000 learning modules completed, resulting in a 31 percent average increase in student's knowledge of financial responsibility.



SUPPLY CHAIN

At Comerica, we work hard to understand our supply chain and appropriately manage the risks and opportunities it presents. We also strive to magnify our positive impacts on the environment and communities by promoting a sustainable supply chain. We take both supplier diversity and the sustainability practices of suppliers into account as part of our rigorous seven-step sourcing process for selecting and evaluating suppliers.

In our own operations, our Green Procurement Work Group looks to source supplies and services that meet environmental criteria where possible. To learn more, see [Environmentally Responsible Procurement](#).

| | |
|-----------------|--|
| 2014 PROGRESS | Roll out of a new supplier management system to track suppliers and prospective suppliers |
| | Continued focus and progress on supplier diversity and sustainability within the supply chain |
| 2014 CHALLENGES | Increased focus on risk management and federal regulations that suppliers have to meet to work with banks, which may adversely impact small, diverse suppliers |
| | Trying to better match supplier diversity spend footprint to customer diversity footprint |
| | Engaging with more suppliers on environmental issues |

Supply Chain Management

Comerica has more than 5,000 suppliers and has an annual supplier spend of approximately \$500+ million dollars, 80 percent of which is with our top 100 suppliers. 49 percent of our supply base (by number of suppliers) and 35 percent of the total spend, is located in two key markets — Texas and Michigan. We use over 1,500 suppliers in Michigan and 1,100 suppliers in Texas.

Our supplier spend falls into the following key categories: technology, telecommunications, information security, facilities & real estate, marketing, human resources, legal, and other banking- and financial services-related products and services.

Our supplier selection criteria includes screening for sustainability practices and supplier diversity. These are two important initiatives for Comerica, emphasizing our diversity and sustainability commitments to our stakeholders.

Environmental Screening of Suppliers

In our [Environmental Policy Statement](#), we commit to giving preference, where appropriate, to suppliers who demonstrate superior environmental performance. In our own operations, we use an Environmentally Preferred Purchasing program (EPP) to reduce our impacts, and we encourage our supply base to do the same.

Since late 2010, we have used a 40-question Environmental Sustainability Questionnaire to collect information about the policies and performance of our existing suppliers. We have focused on suppliers in the previous year's top 30 percent of spend since these suppliers represent our largest suppliers and those providing significant amounts of manufactured goods. The number of suppliers increases considerably above the top 30 percent of spend limiting our availability to provide meaningful engagement on environmental sustainability. Our goal is to repeat the surveys every three years to monitor improvements in performance, and to increase our spend by 5 percent each scoring cycle with suppliers that fall within the acceptable sustainability scoring range of A, B, or C.

When suppliers fall short of an acceptable sustainability rating, the Corporate Procurement sustainability lead and the Corporate Sustainability team conduct performance reviews with the suppliers and suggest potential improvements. We use the standard business reviews with these suppliers to keep track of their sustainability progress.

Performance

We have completed five waves of supplier surveys from 2010-2014. By the end of 2014, we assessed a total of 35 suppliers, representing approximately 34 percent of Comerica's 2014 procurement spend. Of these, over half (52 percent) achieved acceptable ratings. There were 19 firms that scored below the target range and they have been asked to generate a performance improvement plan, as well as improve their score in the next survey.

| | |
|--|--|
| 35 | 34% |
| Number of suppliers screened for environmental sustainability progress | Percentage of spend that was screened for environmental sustainability in 2014 |

Additionally, we sent follow-up questionnaires in 2014 to the first wave of suppliers scored in 2011. We were pleased to see a marked improvement (four of the six scored suppliers achieved an acceptable score). Our spend with Wave 1 suppliers who scored within the questionnaire's acceptable range increased by 30 percent from the first round to the second. During 2014, Comerica spent nearly \$90 million with suppliers that scored in the acceptable range — approximately 16 percent of our accounts payable spend.

Screening New Suppliers

We screen suppliers considered for new business with Comerica using environmental criteria included in the standard language for all Requests for Proposals (RFPs). These criteria address GHG emissions, energy, water, and paper consumption and reduction programs, non-recycled waste, and environmentally preferable procurement practices. Companies responses are a factor in our supplier selection.

Supplier Diversity Program

Comerica is committed to supporting the communities we serve. This includes an ongoing effort to enhance local and regional business success through proactive efforts to hire diverse suppliers. Our Supplier Diversity Program provides capable diverse businesses with an equitable opportunity to supply us with goods and services. Our Corporate Purchasing Department includes a senior-level National Supplier Diversity Manager, who works with regional contacts to identify and support diverse vendors. We establish supplier diversity goals every year based on our projected discretionary spend.

Comerica recognizes independent businesses that are at least 51 percent owned, operated, and controlled by U.S. citizens who are members of one or more of the following groups as diverse suppliers:

| | | | | |
|--|----------------------|-------|---------------------------|--|
| Ethnic minorities: African American, Hispanic American, Native American, Asian Pacific American and Asian Indian American | Disabled individuals | Women | Service Disabled Veterans | Lesbian, Gay, Bi-Sexual and Transgender individuals (LGBT) |
|--|----------------------|-------|---------------------------|--|

Our policy was revised in 2013 to include service disabled veterans and lesbian, gay, bisexual and transgender individuals. Comerica's standard Request for Proposal (RFP) language for sourcing opportunities includes questions around supplier diversity.

Performance

For contracts originating in 2014, our goal was to spend \$55.3 million or 58 percent of this discretionary spend with diverse suppliers. We were proud to exceed that goal, spending \$67.4 million in 2014. The diversity spend was slightly lower compared to our 2013 total of \$70.3 million. However, the percentage of discretionary spend was higher (70 percent in 2014 versus 59 percent in 2013).

2014 Best In Class designation for Supplier Diversity by the Great Lakes Women's Business Council

We track our spending with diverse suppliers quarterly to ensure we are meeting our goals. We also ask our strategic supply partners, as identified by our business units, to meet the same goals we set ourselves — a minimum of 25 percent sourcing from diverse suppliers. We monitor their performance during regularly scheduled business reviews with these suppliers. During 2014, we achieved \$17.3 million through our Tier 2 supplier diversity reporting, an increase of 8 percent over 2012 and similar to our 2013 spend.

Comerica's National Supplier Diversity Manager reviews supplier lists for each sourcing opportunity to ensure that where possible, diverse firms are included. In 2014, 35 percent of RFPs tracked through procurement included diversity suppliers. Of that, 43 percent were awarded to diversity suppliers.

Nominated for Corporation of the Year by the regional affiliates of the National Minority Supplier Development Council in Michigan, Dallas and Houston

Diversity Partners

Comerica works closely with advocacy organizations to increase our outreach efforts with ethnic minority owned businesses. Partners include the regional Minority Supplier Development Councils (MSDCs) in Michigan, Dallas/Fort Worth, Southern California, and Northern California. We are also active with local and national ethnic business associations including the Michigan Hispanic Chamber of Commerce, the Asian Pacific American Chamber of Commerce, and the Detroit Black Chamber.

To support access to our business for women-owned firms, we partner with the Great Lakes Women's Business Council and the National Association of Women Business Owners Greater Detroit Chapter in Michigan, among other regional chapters. Comerica staff serve on boards and committees for many of these organizations and we participate in trade fairs and networking events that help diverse business owners access our procurement decision makers. During 2014, we also co-hosted training seminars for diverse businesses with the Michigan and Dallas/Fort Worth MSDCs and held webinars for our women-owned suppliers.

Sustainability Highlight: Courting Minority Suppliers in California

In 2014 we stepped-up supplier diversity **Involvement** in our California market. Our procurement teams met with more than 20 minority owned businesses at supplier diversity trade fairs, including the Western Regional Minority Supplier Development Council 2014 EXPO in Santa Clara, California.

We also staged an event in San Jose, California, with the non-profit Greenlining Institute, where diverse business owners met with representatives from Comerica and five of our Tier 1 supplier partners (Accenture, ABM, CBRE, Office Depot, and Republic Waste). Each diverse supplier had the opportunity to share his or her company's capabilities with all the corporate attendees resulting in valuable contacts for everyone involved.



ADDITIONAL INFORMATION

Key Statistics Table

| KEY STATISTICS | 2012 | 2013 | 2014 |
|---|---------|---------|---------|
| ECONOMIC IMPACTS | | | |
| Gross revenue (Millions \$) | 2,733 | 2,666 | 2,618 |
| Market capitalization at year end (Millions \$) ¹ | 5,712 | 8,667 | 8,385 |
| Common and preferred stock dividends (Millions \$) | 106 | 126 | 143 |
| Taxes (Millions \$) | 98 | 283 | 165 |
| Employee compensation and benefits (Millions \$) | 1,018 | 1,009 | 980 |
| Goods and services purchased (Millions \$) | 724 | 695 | 628 |
| Total loans at year end (Millions \$) | 46,057 | 45,470 | 48,593 |
| SOCIAL IMPACTS | | | |
| Market Presence | | | |
| Number of ATMs | 640 | 635 | 639 |
| Number of U.S. banking centers | 488 | 482 | 480 |
| Community Development | | | |
| Community and economic development loans (Millions \$) | 174 | 512 | 354 |
| Low-income housing tax credit investment deals closed (Millions \$) | 69 | 74 | 74 |
| Historic rehabilitation tax credit investment (Millions \$) | 1.2 | 6.5 | 0 |
| Number of investments in micro-enterprise loan funds | 29 | 25 | 29 |
| Supplier diversity spend (Millions \$) | 70 | 70 | 67 |
| ENVIRONMENTALLY BENEFICIAL LENDING | | | |
| Environmentally-Beneficial Loans | | | |
| Loan commitments (Millions \$) | 1,043 | 780 | 975 |
| Loan commitments (number of companies) | 127 | 101 | 105 |
| ENVIRONMENT-OPERATIONS | | | |
| Energy Use (MWh) | | | |
| Total direct & indirect energy use- real estate and transport | 153,210 | 149,742 | 146,939 |
| Total direct & indirect energy use- real estate only | 148,266 | 144,783 | 143,015 |
| Direct energy use- fossil fuels | 30,966 | 38,939 | 42,891 |
| Indirect energy use- purchased electricity, steam, chilled water in metered buildings | 93,779 | 85,505 | 80,163 |
| Indirect energy use- estimated electricity use in leased (and unmetered) buildings | 28,465 | 25,298 | 23,885 |
| Energy Intensity | | | |
| Total direct and indirect energy use- real estate (MWh) per square foot at year end | 0.0267 | 0.0267 | 0.0267 |

| KEY STATISTICS | 2012 | 2013 | 2014 |
|---|--------|--------|--------|
| Total direct and indirect energy use- real estate (MWh) per square foot - average square feet over four quarters | N/A | 0.0265 | 0.0265 |
| Total direct and indirect energy use (MWh) per full time employee (FTE) | 16.96 | 16.73 | 16.55 |
| Scopes 1 & 2 GHG Emissions (Metric tons of CO ₂ e)- Real Estate and Transport ² | | | |
| Total GHG Emissions from Real Estate (Scopes 1&2) and Travel (Scope 1) | 81,735 | 75,839 | 73,200 |
| Breakdown by Activity | | | |
| GHG emissions- Scopes 1 & 2 real estate only | 80,534 | 74,635 | 72,247 |
| Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end) | 0.0145 | 0.0138 | 0.0135 |
| Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters) | N/A | 0.0137 | 0.0134 |
| % Cumulative reduction from 2012 base year (Goal= 20% GHG reduction from base year by 2020) | N/A | 7.2 | 10.3 |
| GHG emissions- Scope 1 transport only | 1,201 | 1,204 | 953 |
| Breakdown by Scope | | | |
| Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants | 6,950 | 8,019 | 8,523 |
| Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings | 74,784 | 67,820 | 64,677 |
| Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport ² | | | |
| Purchased Goods & Services | | | |
| Total lifecycle paper emissions | 3,055 | 2,873 | 2,511 |
| Life cycle emissions associated with office copy paper use | 1,270 | 1,136 | 1,030 |
| Life cycle emissions associated with other office paper use | 1,563 | 1,558 | 1,262 |
| Life cycle emissions associated with marketing paper use | 222 | 178 | 219 |
| Total lifecycle computer emissions | 520 | 57 | 202 |
| Total lifecycle carpeting emissions | 137 | 168 | 125 |
| Capital Goods | | | |
| Total lifecycle furniture emissions | N/A | 463 | 148 |
| Fuel-and-energy related activities | | | |
| Electricity transmission/distribution loss emissions | N/A | 4,442 | 4,302 |
| Upstream Transportation and Distribution | | | |
| Shipping emissions | N/A | 572 | 404 |
| Armored vehicle emissions | N/A | 967 | 635 |
| Waste Generated in Operations | | | |
| Scope 3 lifecycle emissions associated with landfilled mixed solid waste | 2,052 | 2,033 | 914 |
| Business Travel | | | |
| Employee business travel by air and car | 4,431 | 4,791 | 4,147 |
| Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE) | 0.49 | 0.54 | 0.47 |
| Employee Commuting | | | |
| Employee commuting emissions | N/A | 35,864 | 33,200 |

| KEY STATISTICS | 2012 | 2013 | 2014 |
|--|-----------|-----------|-----------|
| Downstream Leased Assets | | | |
| Total subleased real estate emissions | 1,257 | 1,508 | 1,869 |
| Subleased metered electricity | 726 | 665 | 629 |
| Subleased estimated electricity | 423 | 715 | 1,107 |
| Subleased natural gas | 81 | 106 | 108 |
| Subleased steam | 28 | 22 | 25 |
| Other Downstream | | | |
| Subleased corporate jet emissions | N/A | N/A | 272 |
| Real Estate Square Footage (Square feet at year end) | | | |
| Total metered and unmetered square feet | 5,545,466 | 5,422,833 | 5,349,936 |
| Total subleased square feet at year end | 137,637 | 197,753 | 188,292 |
| Real Estate Square Footage (Average square feet over four quarters) | | | |
| Average metered and unmetered square feet over four quarters | N/A | 5,464,632 | 5,398,441 |
| Average subleased square feet over four quarters | N/A | 159,866 | 193,282 |
| Waste Management (short tons) | | | |
| Landfilled employee waste | 2,086 | 2,067 | 1,732 |
| Total recycled/re-purposed waste | 3,372 | 2,990 | 2,915 |
| Recycled office paper | 3,108 | 2,680 | 2,684 |
| Recycled electronic equipment | 94 | 117 | 52 |
| Repurposed electronic equipment | 55 | 46 | 15 |
| Recycled employee waste | 110 | 141 | 154 |
| Recycled cardboard bailer waste | N/A | N/A | 7 |
| Universal waste | 3 | 5 | 3 |
| Total waste diverted from landfill (%) including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste | 62 | 59 | 63 |
| Water Use (cubic meters)³ | | | |
| Total water consumption (cubic meters) | 451,532 | 412,123 | 349,785 |
| Intensity metric- Water consumption (cubic meters per FTE) | 49.98 | 46.06 | 39.41 |
| Intensity metric- Water consumption (cubic meters per Total Occupant FTE) | N/A | 43.83 | 37.03 |
| Paper Use | | | |
| Total paper consumption (tons) | 1,266 | 1,173 | 1,039 |
| Office copy paper consumption (tons) | 560 | 487 | 454 |
| Other office paper consumption (tons) | 618 | 615 | 499 |
| Marketing paper consumption (tons) | 88 | 71 | 87 |
| Intensity metric- Total office paper (office copy and other office paper) consumption in pounds per FTE | 260.76 | 246.31 | 214.73 |
| Intensity metric- Office copy paper consumption in pounds per FTE (tons) | 123.96 | 108.88 | 102.30 |
| <i>Environmental Attributes of Paper</i> | | | |
| Total FSC-certified office paper (% of total) | 47.48 | 27.88 | 47.82 |
| Total FSC-certified marketing paper (% of total) | 64.46 | 90.44 | 80.00 |

| KEY STATISTICS | 2012 | 2013 | 2014 |
|---|---------|---------|---------|
| Office copy paper with at least 30 % post-consumer recycled content (%) | 97.18 | 73.85 | 95.55 |
| All other papers (excluding office copy paper) with at least 10% post-consumer recycled content (%) | 13.93 | 11.77 | 13.85 |
| Total post-consumer recycled content by weight (% of total paper consumption) | 14.03 | 12.60 | 10.43 |
| EMPLOYEES | | | |
| Number of Comerica Employees | | | |
| Total Employees- Full-time equivalents (FTEs) | 9,035 | 8,948 | 8,876 |
| Total Occupants for combined portfolio (including employees and contractors, on FTE basis) | N/A | 9,403 | 9,447 |
| Employee Diversity | | | |
| Women employees (%) | 68 | 68 | 67 |
| Women Officers and Managers (total number) | N/A | 1,124 | 1,112 |
| Women Professionals (total number) | N/A | 1,795 | 1,820 |
| Women Administrative Support (total number) | N/A | 3,317 | 3,163 |
| Diverse population employees (%) | 38 | 38 | 38 |
| Diverse Officers and Managers (total number) | N/A | 521 | 534 |
| Diverse Professionals (total number) | N/A | 971 | 1,032 |
| Diverse Administrative Support (total number) | N/A | 1,997 | 1,901 |
| Employee Benefits | | | |
| Number of employees assisted through Comerica's Employee Assistance Program | 2,358 | 2,194 | 1,737 |
| Employees receiving tuition assistance (total number) | 132 | 248 | 226 |
| Value of tuition assistance received (\$) | 852,680 | 886,599 | 801,200 |
| Leadership Development Program (number of graduates) | 47 | 49 | 44 |
| CoStar Awards (number of monetary awards to employees) | 2,657 | 2,746 | 2,571 |
| Value of CoStar Awards (\$) | 378,000 | 392,000 | 391,000 |
| COMMUNITY | | | |
| Charitable gifts and corporate contributions (Millions \$) ⁴ | 9.1 | 8.4 | 8.8 |
| Employee United Way contributions (Millions \$) | 2.0 | 2.2 | 2.1 |
| Employee time volunteered (hours) | 71,000 | 72,186 | 73,970 |
| Number of employee volunteers | 2,300 | 2,514 | 2,543 |

¹ Source: SNL Financial

² Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its greenhouse gas (GHG) emissions. Specific methodologies for estimating all Scope 1, Scope 2, and Scope 3 emissions shown in the above table, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in Comerica's [2015 CDP Response](#).

³ Our "direct billed" water consumption includes all properties for which Comerica receives and pays water bills directly via our utility bill payment and management system. Leased properties controlled by our landlords are not included in these totals.

⁴ Previously reported 2013 charitable gifts and contributions number of \$8.2MM has been revised to \$8.4MM.



Comerica Bank:
MEMBER FDIC. EQUAL OPPORTUNITY LENDER.

Comerica:
EQUAL OPPORTUNITY EMPLOYER.
Comerica Conducts Pre-Employment Drug Testing

GRI G4 Content Index- Core

Please note: Throughout our 2014 Comerica Sustainability Report we use the terms "relevancy", "significance", and "impact" to refer to those topics that reflect the economic, environmental, social, and governance issues most important to Comerica and our stakeholders — what the GRI Sustainability Reporting Guidelines define as "Material Aspects." This is to avoid potential confusion with the terms "material" or "materiality" as defined by or construed in accordance with securities laws or other U.S. legislation, or as used in the context of financial statements and financial reporting. In this GRI G4 Content Index, our use of the terms "material" and "non-material" only refer to the meanings as referenced in defining report content in the context of GRI's reporting guidelines.

This Index has been created to meet the "Core" requirements of GRI G4. In some instances, we have also included non-core GRI General Standard Disclosures where we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents. We have also incorporated information on some Aspects within the Specific Standard Disclosures, which we have determined to be "non-material" since that information may be of interest to our stakeholders. Although our 2014 Comerica Sustainability Report meets the GRI G4 Core requirements, in this time of transition from GRI G3.1 to G4, we have also included a GRI G3.1 Content Index (provided immediately after the GRI G4 index) and cross references G4 disclosures.

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|---|---------------------------|---|----------------------------------|--|--|---|---|--|
| GENERAL STANDARD DISCLOSURES- CORE | | | | | | | | |
| STRATEGY AND ANALYSIS | | | | | | | | |
| G4-1 | — | <p>a. Provide a statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and the organization's strategy for addressing sustainability.</p> <p>The statement should present the overall vision and strategy for the short term, medium term, and long term, particularly with regard to managing the significant economic, environmental and social impacts that the organization causes and contributes to, or the impacts that can be linked to its activities as a result of relationships with others (such as suppliers, people or organizations in local communities). The statement should include:</p> <ul style="list-style-type: none"> • Strategic priorities and key topics for the short and medium term with regard to sustainability, including respect for internationally recognized standards and how such standards relate to long term organizational strategy and success • Broader trends (such as macroeconomic or political) affecting the organization and influencing sustainability priorities • Key events, achievements, and failures during the reporting period • Views on performance with respect to targets • Outlook on the organization's main challenges and targets for the next year and goals for the coming 3–5 years • Other items pertaining to the organization's strategic approach | Yes | Full response for Core | Letter from our Chairman and CEO | — | — | No |
| ORGANIZATIONAL PROFILE | | | | | | | | |
| G4-3 | — | a. Report the name of the organization. | Yes | Full response for Core | Company Profile | — | — | No |
| G4-4 | — | a. Report the primary brands, products, and services. | Yes | Full response for Core | Company Profile | — | — | No |
| G4-5 | — | a. Report the location of the organization's headquarters. | Yes | Full response for Core Comerica Corporate Headquarters Comerica Bank Tower 1717 Main Street Dallas, Texas 75201 | This GRI Index | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---------------------|---------------------------|--|----------------------------------|---|--|---|--|--------------------|
| G4-6 | — | a. Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report. | Yes | Full response for Core | Company Profile | — | — | No |
| G4-7 | — | a. Report the nature of ownership and legal form. | Yes | Full response for Core | Company Profile | — | — | No |
| G4-8 | — | a. Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries). | Yes | Full response for Core | Company Profile | — | — | No |
| G4-9 | — | a. Report the scale of the organization, including: • Total number of employees • Total number of operations • Net sales (for private sector organizations) or net revenues (for public sector organizations) • Total capitalization broken down in terms of debt and equity (for private sector organizations) • Quantity of products or services provided | Yes | Full response for Core | Company Profile Key Statistics Table 2014 Annual Report | — | — | No |
| G4-10 | — | a. Report the total number of employees by employment contract and gender. b. Report the total number of permanent employees by employment type and gender. c. Report the total workforce by employees and supervised workers and by gender. d. Report the total workforce by region and gender. e. Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors. f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries). | Yes | Full response for Core The majority of work is performed by Comerica payrolled employees. Contingent workers represent less than 10% of our total workforce. There are no seasonal variations in employment. | Employees Diversity and Inclusion Key Statistics Table This GRI Index | Total number of supervised (contingent) workers by gender | We do not collect data by gender for our contingent workforce. | No |
| G4-11 | — | a. Report the percentage of total employees covered by collective bargaining agreements. | Yes | Full response for Core 0% of total employees are covered by collective bargaining agreements. | This GRI Index | — | — | No |
| G4-12 | — | a. Describe the organization's supply chain. | Yes | Full response for Core | Supply Chain Management | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---------------------------|---|----------------------------------|---|--|------------------------|---------------------------|--------------------|
| G4-13 | — | <p>a. Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain, including:</p> <ul style="list-style-type: none"> • Changes in the location of, or changes in, operations, including facility openings, closings, and expansions • Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations) • Changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination | Yes | Full response for Core | Company Profile 2014 Annual Report | — | — | No |
| G4-14 | — | a. Report whether and how the precautionary approach or principle is addressed by the organization. | Yes | Full response for Core | Risk Management | — | — | No |
| G4-15 | — | a. List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses. | Yes | Full response for Core Comerica does not subscribe or endorse externally developed charters or principles. | This GRI Index | — | — | No |
| G4-16 | — | <p>a. List memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization:</p> <ul style="list-style-type: none"> • Holds a position on the governance body • Participates in projects or committees • Provides substantive funding beyond routine membership dues • Views membership as strategic <p>This refers primarily to memberships maintained at the organizational level.</p> | Yes | Full response for Core | Risk Management Public Policy Community Reinvestment and Development Supplier Diversity Program | — | — | No |
| IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES | | | | | | | | |
| G4-17 | — | <p>a. List all entities included in the organization's consolidated financial statements or equivalent documents.</p> <p>b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.</p> <p>The organization can report on this Standard Disclosure by referencing the information in publicly available consolidated financial statements or equivalent documents.</p> | Yes | Full response for Core | About this Report Company Profile 2014 Annual Report | — | — | No |
| G4-18 | — | <p>a. Explain the process for defining the report content and the Aspect Boundaries.</p> <p>b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.</p> | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| G4-19 | — | a. List all the material Aspects identified in the process for defining report content. | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| G4-20 | — | <p>a. For each material Aspect, report the Aspect Boundary within the organization, as follows:</p> <ul style="list-style-type: none"> • Report whether the Aspect is material within the organization • If the Aspect is not material for all entities within the organization (as described in G4-17), select one of the following two approaches and report either: <ul style="list-style-type: none"> – The list of entities or groups of entities included in G4-17 for which the Aspect is not material or – The list of entities or groups of entities included in G4-17 for which the Aspects is material • Report any specific limitation regarding the Aspect Boundary within the organization | Yes | Full response for Core | Stakeholder Engagement | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|-------------------------------|---------------------------|--|----------------------------------|--|--|---|---|--|
| G4-21 | — | a. For each material Aspect, report the Aspect Boundary outside the organization, as follows: <ul style="list-style-type: none"> • Report whether the Aspect is material outside of the organization • If the Aspect is material outside of the organization, identify the entities, groups of entities or elements for which the Aspect is material. In addition, describe the geographical location where the Aspect is material for the entities identified • Report any specific limitation regarding the Aspect Boundary outside the organization | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| G4-22 | — | a. Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements. | Yes | Full response for Core There were no material restatements of information provided in our 2013 Comerica Sustainability Progress Report or the 2012 Comerica Sustainability Report | This GRI Index | — | — | No |
| G4-23 | — | a. Report significant changes from previous reporting periods in the Scope and Aspect Boundaries. | Yes | Full response for Core | About this Report | — | — | No |
| STAKEHOLDER ENGAGEMENT | | | | | | | | |
| G4-24 | — | a. Provide a list of stakeholder groups engaged by the organization. | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| G4-25 | — | a. Report the basis for identification and selection of stakeholders with whom to engage. | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| G4-26 | — | a. Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process. | Yes | Full response for Core | Approach to Sustainability Stakeholder Engagement | — | — | No |
| G4-27 | — | a. Report key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns. | Yes | Full response for Core | Stakeholder Engagement | — | — | No |
| REPORT PROFILE | | | | | | | | |
| G4-28 | — | a. Reporting period (such as fiscal or calendar year) for information provided. | Yes | Full response for Core | About this Report | — | — | No |
| G4-29 | — | a. Date of most recent previous report (if any). | Yes | Full response for Core | About this Report | — | — | No |
| G4-30 | — | a. Reporting cycle (such as annual, biennial). | Yes | Full response for Core | About this Report | — | — | No |
| G4-31 | — | a. Provide the contact point for questions regarding the report or its contents. | Yes | Full response for Core | About this Report | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|-----------------------------|---------------------------|---|----------------------------------|--|--|------------------------|---------------------------|---|
| G4-32 | — | a. Report the 'in accordance' option the organization has chosen. b. Report the GRI Content Index for the chosen option. c. Report the reference to the External Assurance Report, if the report has been externally assured. GRI recommends the use of external assurance but it is not a requirement to be 'in accordance' with the Guidelines. | Yes | Full response for Core | About this Report | — | — | No |
| G4-33 | — | a. Report the organization's policy and current practice with regard to seeking external assurance for the report. b. If not included in the assurance report accompanying the sustainability report, report the scope and basis of any external assurance provided. c. Report the relationship between the organization and the assurance providers. d. Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report. | Yes | Full response for Core At this time, Comerica's current practice is to seek verification for greenhouse gas emissions only. | This GRI Index 2015 CDP Response | — | — | Partial - 2015 CDP Response |
| GOVERNANCE | | | | | | | | |
| G4-34 | — | a. Report the governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental and social impacts. | Yes | Full response for Core | Corporate Governance Corporate Governance Guidelines | — | — | No |
| ETHICS AND INTEGRITY | | | | | | | | |
| G4-56 | — | a. Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics. | Yes | Full response for Core | Business Ethics Guidelines to Ethical Business Conduct Code of Business Conduct and Ethics for Employees Senior Financial Officer Code of Ethics Code of Business Conduct and Ethics for Members of the Board of Directors | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|---|---------------------------|---|----------------------------------|---|--|---|---|--|
| GENERAL STANDARD DISCLOSURES - COMPREHENSIVE: PLEASE NOTE: We have not attempted to prepare this GRI Report Content Index in accordance with GRI G4 Comprehensive requirements. However, where we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents, we have identified it below. We have not responded to the following comprehensive standard disclosures: G4-36, G4-44, G4-46, G4-48, G4-50, G4-54, and G4-55. These disclosures are not required to meet GRI G4 Core, which is the goal of our 2014 report. | | | | | | | | |
| G4-2 | — | <p>a. Provide a description of key impacts, risks, and opportunities. The organization should provide two concise narrative sections on key impacts, risks, and opportunities.</p> <p>Section One should focus on the organization's key impacts on sustainability and effects on stakeholders, including rights as defined by national laws and relevant internationally recognized standards. This should take into account the range of reasonable expectations and interests of the organization's stakeholders. This section should include:</p> <ul style="list-style-type: none"> • A description of the significant economic, environmental and social impacts of the organization, and associated challenges and opportunities. This includes the effect on stakeholders' rights as defined by national laws and the expectations in internationally recognized standards and norms • An explanation of the approach to prioritizing these challenges and opportunities • Key conclusions about progress in addressing these topics and related performance in the reporting period. This includes an assessment of reasons for underperformance or over-performance • A description of the main processes in place to address performance and relevant changes <p>Section Two should focus on the impact of sustainability trends, risks, and opportunities on the long-term prospects and financial performance of the organization. This should concentrate specifically on information relevant to financial stakeholders or that could become so in the future. Section Two should include the following:</p> <ul style="list-style-type: none"> • A description of the most important risks and opportunities for the organization arising from sustainability trends • Prioritization of key sustainability topics as risks and opportunities according to their relevance for long-term organizational strategy, competitive position, qualitative, and (if possible) quantitative financial value drivers • Table(s) summarizing: <ul style="list-style-type: none"> – Targets, performance against targets, and lessons learned for the current reporting period – Targets for the next reporting period and medium term objectives and goals (that is, 3–5 years) related to key risks and opportunities • Concise description of governance mechanisms in place specifically to manage these risks and opportunities, and identification of other related risks and opportunities | — | Partial response, not needed to meet Core | Approach to Sustainability Stakeholder Engagement 2015 CDP Response | — | — | — |
| G4-35 | — | a. Report the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees. | — | Partial response, not needed to meet Core | Risk Management | — | — | — |
| G4-37 | — | a. Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body. | — | Partial response, not needed to meet Core | Approach to Sustainability | — | — | — |
| G4-38 | — | <p>a. Report the composition of the highest governance body and its committees by:</p> <ul style="list-style-type: none"> • Executive or non-executive • Independence • Tenure on the governance body • Number of each individual's other significant positions and commitments, and the nature of the commitments • Gender • Membership of under-represented social groups • Competences relating to economic, environmental and social impacts • Stakeholder representation | — | Full response, not needed to meet Core | Corporate Governance Proxy Statement Corporate Governance Guidelines | — | — | — |
| G4-39 | — | a. Report whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement). | — | Full response, not needed to meet Core | Proxy Statement 2014 Annual Report | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | Page Number (or Link) | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---------------------|---------------------------|---|----------------------------------|---|---|------------------------|---------------------------|---|
| | | | | | | | | Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
| G4-40 | — | a. Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members, including: • Whether and how diversity is considered • Whether and how independence is considered • Whether and how expertise and experience relating to economic, environmental and social topics are considered • Whether and how stakeholders (including shareholders) are involved | — | Full response, not needed to meet Core | Proxy Statement Corporate Governance Guidelines | — | — | — |
| G4-41 | — | a. Report processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders, including, as a minimum: • Cross-board membership • Cross-shareholding with suppliers and other stakeholders • Existence of controlling shareholder • Related party disclosures | — | Full response, not needed to meet Core | Proxy Statement Corporate Governance Guidelines | — | — | — |
| G4-42 | — | a. Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts. | — | Partial response, not needed to meet Core | Proxy Statement Corporate Governance Guidelines | — | — | — |
| G4-43 | — | a. Report the measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics. | — | Partial response, not needed to meet Core | Approach to Sustainability | — | — | — |
| G4-45 | — | a. Report the highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes. b. Report whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental and social impacts, risks, and opportunities. | — | Partial response, not needed to meet Core | Stakeholder Engagement Corporate Governance Guidelines | — | — | — |
| G4-47 | — | a. Report the frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities. | — | Partial response, not needed to meet Core | Approach to Sustainability Corporate Governance Guidelines | — | — | — |
| G4-49 | — | a. Report the process for communicating critical concerns to the highest governance body. | — | Partial response, not needed to meet Core | Approach to Sustainability Corporate Governance Guidelines | — | — | — |
| G4-51 | — | a. Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration: • Fixed pay and variable pay: – Performance-based pay – Equity-based pay – Bonuses – Deferred or vested shares • Sign-on bonuses or recruitment incentive payments • Termination payments • Clawbacks • Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees b. Report how performance criteria in the remuneration policy relate to the highest governance body's and senior executives' economic, environmental and social objectives. | — | Full response, not needed to meet Core | Proxy Statement Corporate Governance | — | — | — |
| G4-52 | — | a. Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organization. | — | Full response, not needed to meet Core | Proxy Statement Corporate Governance Guidelines | — | — | — |
| G4-53 | — | a. Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable. | — | Full response, not needed to meet Core | Proxy Statement Corporate Governance Guidelines | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--------------------------------------|--|--|----------------------------------|--|--|------------------------|---------------------------|--------------------|
| G4-57 | — | a. Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines. | — | Full response, not needed to meet Core | Business Ethics Corporate Governance Guidelines | — | — | — |
| G4-58 | — | a. Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines. | — | Full response, not needed to meet Core | Business Ethics Employee Engagement Corporate Governance Guidelines | — | — | — |
| SPECIFIC STANDARD DISCLOSURES | | | | | | | | |
| CATEGORY: ECONOMIC | | | | | | | | |
| ASPECT: ECONOMIC PERFORMANCE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach <p>See the Financial Services Sector Disclosures document for more EC DMA requirements.</p> | Yes | Full response for Core | Stakeholder Engagement Economic Impact Community | — | — | No |
| G4-EC1 | Direct economic value generated and distributed | <p>a. Report the direct economic value generated and distributed (EVG&D) on an accruals basis including the basic components for the organization's global operations as listed below. If data is presented on a cash basis, report the justification for this decision and report the basic components as listed below:</p> <ul style="list-style-type: none"> • Direct economic value generated: <ul style="list-style-type: none"> – Revenues • Economic value distributed: <ul style="list-style-type: none"> – Operating costs – Employee wages and benefits – Payments to providers of capital – Payments to government (by country) – Community investments • Economic value retained (calculated as 'Direct economic value generated' less 'Economic value distributed') <p>b. To better assess local economic impacts, report EVG&D separately at country, regional, or market levels, where significant. Report the criteria used for defining significance.</p> <p>See the Financial Services Sector Disclosures document for more EC1 requirements.</p> | Yes | Full response for Core | Community Key Statistics Table 2014 Annual Report | — | — | No |
| G4-EC2 | Financial implications and other risks and opportunities for the organization's activities due to climate change | <p>a. Report risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue or expenditure, including:</p> <ul style="list-style-type: none"> • A description of the risk or opportunity and its classification as either physical, regulatory, or other • A description of the impact associated with the risk or opportunity • The financial implications of the risk or opportunity before action is taken • The methods used to manage the risk or opportunity • The costs of actions taken to manage the risk or opportunity | Yes | Full response for Core | Risk Management Climate Change 2015 CDP Response | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|--------------------------------|--|---|----------------------------------|----------|--|---|---|--|
| G4-EC3 | Coverage of the organization's defined benefit plan obligations | <ul style="list-style-type: none"> a. Where the plan's liabilities are met by the organization's general resources, report the estimated value of those liabilities. b. Where a separate fund exists to pay the plan's pension liabilities, report: <ul style="list-style-type: none"> • The extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them • The basis on which that estimate has been arrived at • When that estimate was made c. Where a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage. d. Report the percentage of salary contributed by employee or employer. e. Report the level of participation in retirement plans (such as participation in mandatory or voluntary schemes, regional or country-based schemes, or those with financial impact). | No | — | — | — | — | — |
| G4-EC4 | Financial assistance received from government | <ul style="list-style-type: none"> a. Report the total monetary value of financial assistance received by the organization from governments during the reporting period, including, as a minimum: <ul style="list-style-type: none"> • Tax relief and tax credits • Subsidies • Investment grants, research and development grants, and other relevant types of grants • Awards • Royalty holidays • Financial assistance from Export Credit Agencies (ECAs) • Financial incentives • Other financial benefits received or receivable from any government for any operation b. Report the information above by country. c. Report whether, and the extent to which, the government is present in the shareholding structure. | No | — | — | — | — | — |
| ASPECT: MARKET PRESENCE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <ul style="list-style-type: none"> a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-EC5 | Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation | <ul style="list-style-type: none"> a. When a significant proportion of the workforce is compensated based on wages subject to minimum wage rules, report the ratio of the entry level wage by gender at significant locations of operation to the minimum wage. b. Report whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums could be used as a reference, report which minimum wage is being used. c. Report the definition used for 'significant locations of operation'. | No | — | — | — | — | — |
| G4-EC6 | Proportion of senior management hired from the local community at significant locations of operation | <ul style="list-style-type: none"> a. Report the percentage of senior management at significant locations of operation that are hired from the local community. b. Report the definition of 'senior management' used. c. Report the organization's geographical definition of 'local'. d. Report the definition used for 'significant locations of operation'. | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--|---|---|----------------------------------|------------------------|---|------------------------|---------------------------|--------------------|
| ASPECT: INDIRECT ECONOMIC IMPACTS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Economic Impact Risk Management | — | — | No |
| ASPECT: PROCUREMENT PRACTICES | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | Supply Chain | — | — | — |
| G4-EC9 | Proportion of spending on local suppliers at significant locations of operation | <p>a. Report the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation (such as percentage of products and services purchased locally).</p> <p>b. Report the organization's geographical definition of 'local'.</p> <p>c. Report the definition used for 'significant locations of operation'.</p> | No | — | Supply Chain | — | — | — |

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. | |
|--------------------------------|--|--|----------------------------------|--|--|---|---|--|----|
| CATEGORY: ENVIRONMENTAL | | | | | | | | | |
| ASPECT: MATERIALS | | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Paper | — | — | — | No |
| G4-EN1 | Materials used by weight or volume | a. Report the total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by: • Non-renewable materials used • Renewable materials used | Yes | Full response for Core | Paper Key Statistics Table | — | — | Yes, 2015 CDP Response | |
| G4-EN2 | Percentage of materials used that are recycled input materials | a. Report the percentage of recycled input materials used to manufacture the organization's primary products and services. | Yes | Full response for Core | Paper Key Statistics Table | — | — | No | |
| ASPECT: ENERGY | | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Energy and GHG Emissions | — | — | — | No |
| G4-EN3 | Energy consumption within the organization | a. Report total fuel consumption from non-renewable sources in joules or multiples, including fuel types used. b. Report total fuel consumption from renewable fuel sources in joules or multiples, including fuel types used. c. Report in joules, watt-hours or multiples, the total: • Electricity consumption • Heating consumption • Cooling consumption • Steam consumption d. Report in joules, watt-hours or multiples, the total: • Electricity sold • Heating sold • Cooling sold • Steam sold e. Report total energy consumption in joules or multiples. f. Report standards, methodologies, and assumptions used. g. Report the source of the conversion factors used. | Yes | Full response for Core In 2014, except for low carbon electricity, heat, steam or cooling that may offered as part of the regional mix of energy sources provided by local utility providers, Comerica did not purchase or generate any low or no carbon energy sources. We also did not sell any energy to others. | This GRI Index Energy & GHG Emissions Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response | |

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|----------------------|--|--|----------------------------------|------------------------|--|---|---|--|
| G4-EN4 | Energy consumption outside of the organization | a. Report energy consumed outside of the organization, in joules or multiples. b. Report standards, methodologies, and assumptions used. c. Report the source of the conversion factors used. | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | No |
| G4-EN5 | Energy intensity | a. Report the energy intensity ratio. b. Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio. c. Report the types of energy included in the intensity ratio: fuel, electricity, heating, cooling, steam, or all. d. Report whether the ratio uses energy consumed within the organization, outside of it or both. | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | No |
| G4-EN6 | Reduction of energy consumption | a. Report the amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples. b. Report the types of energy included in the reductions: fuel, electricity, heating, cooling, and steam. c. Report the basis for calculating reductions in energy consumption such as base year or baseline, and the rationale for choosing it. d. Report standards, methodologies, and assumptions used. | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | No |
| G4-EN7 | Reductions in energy requirements of products and services | a. Report the reductions in the energy requirements of sold products and services achieved during the reporting period, in joules or multiples. b. Report the basis for calculating reductions in energy consumption such as base year or baseline, and the rationale for choosing it. c. Report standards, methodologies, and assumptions used. | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | No |
| ASPECT: WATER | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Water Stewardship | — | — | No |
| G4-EN8 | Total water withdrawal by source | a. Report the total volume of water withdrawn from the following sources: • Surface water, including water from wetlands, rivers, lakes, and oceans • Ground water • Rainwater collected directly and stored by the organization • Waste water from another organization • Municipal water supplies or other water utilities b. Report standards, methodologies, and assumptions used. | Yes | Full response for Core | This GRI Index Water Stewardship Key Statistics Table | Although we have a couple wells in Michigan for irrigation purposes and one well in Texas (currently not in use) for backup emergency water for the building's HVAC system, the only water metric that we are able to measure is the water which is sourced through local utilities and is tracked through the utility water meter. | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|-----------------------------|--|--|----------------------------------|----------|--|------------------------|---------------------------|--------------------|
| G4-EN9 | Water sources significantly affected by withdrawal of water | <p>a. Report the total number of water sources significantly affected by withdrawal by type:</p> <ul style="list-style-type: none"> • Size of water source • Whether or not the source is designated as a protected area (nationally or internationally) • Biodiversity value (such as species diversity and endemism, total number of protected species) • Value or importance of water source to local communities and indigenous peoples <p>b. Report standards, methodologies, and assumptions used.</p> | No | — | — | — | — | No |
| G4-EN10 | Percentage and total volume of water recycled and reused | <p>a. Report the total volume of water recycled and reused by the organization.</p> <p>b. Report the total volume of water recycled and reused as a percentage of the total water withdrawal reported under Indicator G4-EN8.</p> <p>c. Report standards, methodologies, and assumptions used.</p> | No | — | — | — | — | No |
| ASPECT: BIODIVERSITY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-EN11 | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | <p>a. Report the following information for each operational site owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas:</p> <ul style="list-style-type: none"> • Geographic location • Subsurface and underground land that may be owned, leased, or managed by the organization • Position in relation to the protected area (in the area, adjacent to, or containing portions of the protected area) or the high biodiversity value area outside protected areas • Type of operation (office, manufacturing or production, or extractive) • Size of operational site in km² • Biodiversity value characterized by: <ul style="list-style-type: none"> – The attribute of the protected area or high biodiversity value area outside the protected area (terrestrial, freshwater, or maritime ecosystem) – Listing of protected status (such as IUCN Protected Area Management Categories, Ramsar Convention, national legislation) | No | — | — | — | — | — |
| G4-EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas | <p>a. Report the nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:</p> <ul style="list-style-type: none"> • Construction or use of manufacturing plants, mines, and transport infrastructure • Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources) • Introduction of invasive species, pests, and pathogens • Reduction of species • Habitat conversion • Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level) <p>b. Report significant direct and indirect positive and negative impacts with reference to the following:</p> <ul style="list-style-type: none"> • Species affected • Extent of areas impacted • Duration of impacts • Reversibility or irreversibility of the impacts | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--------------------------|---|--|----------------------------------|------------------------|--|------------------------|---------------------------|--|
| G4-EN13 | Habitats protected or restored | <p>a. Report the size and location of all habitat protected areas or restored areas, and whether the success of the restoration measure was or is approved by independent external professionals.</p> <p>b. Report whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures.</p> <p>c. Report on the status of each area based on its condition at the close of the reporting period.</p> <p>d. Report standards, methodologies, and assumptions used.</p> | No | — | — | — | — | — |
| G4-EN14 | Total number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk | <p>a. Report the total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:</p> <ul style="list-style-type: none"> • Critically endangered • Endangered • Vulnerable • Near threatened • Least concern | No | — | — | — | — | — |
| ASPECT: EMISSIONS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Energy and GHG Emissions | — | — | No |
| G4-EN15 | Direct greenhouse gas (GHG) emissions (Scope 1) | <p>a. Report gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent, independent of any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation (whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all).</p> <p>c. Report biogenic CO2 emissions in metric tons of CO2 equivalent separately from the gross direct (Scope 1) GHG emissions.</p> <p>d. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>e. Report standards, methodologies, and assumptions used.</p> <p>f. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source.</p> <p>g. Report the chosen consolidation approach for emissions (equity share, financial control, operational control).</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p> | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response |
| G4-EN16 | Energy indirect greenhouse gas (GHG) emissions (Scope 2) | <p>a. Report gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent, independent of any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation, if available.</p> <p>c. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>d. Report standards, methodologies, and assumptions used.</p> <p>e. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source, if available.</p> <p>f. Report the chosen consolidation approach for emissions (equity share, financial control, operational control).</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p> | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---------------------|---|--|----------------------------------|------------------------|--|------------------------|---------------------------|--|
| G4-EN17 | Other indirect greenhouse gas (GHG) emissions (Scope 3) | <p>a. Report gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent, excluding indirect emissions from the generation of purchased or acquired electricity, heating, cooling, and steam consumed by the organization (these indirect emissions are reported in Indicator G4-EN16). Exclude any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation, if available.</p> <p>c. Report biogenic CO₂ emissions in metric tons of CO₂ equivalent separately from the gross other indirect (Scope 3) GHG emissions.</p> <p>d. Report other indirect (Scope 3) emissions categories and activities included in the calculation.</p> <p>e. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>f. Report standards, methodologies, and assumptions used.</p> <p>g. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source, if available.</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p> | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response |
| G4-EN18 | Greenhouse gas (GHG) emissions intensity | <p>a. Report the GHG emissions intensity ratio.</p> <p>b. Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio.</p> <p>c. Report the types of GHG emissions included in the intensity ratio: direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3).</p> <p>d. Report gases included in the calculation.</p> | Yes | Full response for Core | Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response |
| G4-EN19 | Reduction of greenhouse gas (GHG) emissions | <p>a. Report the amount of GHG emissions reductions achieved as a direct result of initiatives to reduce emissions, in metric tons of CO₂ equivalent.</p> <p>b. Report gases included in the calculation (whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all).</p> <p>c. Report the chosen base year or baseline and the rationale for choosing it.</p> <p>d. Report standards, methodologies, and assumptions used.</p> <p>e. Report whether the reductions in GHG emissions occurred in direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3) emissions.</p> | Yes | Full response for Core | Energy and GHG Emissions Key Statistics Table 2015 CDP Response | — | — | Yes, 2015 CDP Response |
| G4-EN20 | Emissions of ozone-depleting substances (ODS) | <p>a. Report production, imports, and exports of ODS in metric tons of CFC-11 equivalent.</p> <p>b. Report substances included in the calculation.</p> <p>c. Report standards, methodologies, and assumptions used.</p> <p>d. Report the source of the emission factors used.</p> | No | — | — | — | — | — |
| G4-EN21 | NOX, SOX, and other significant air emissions | <p>a. Report the amount of significant air emissions, in kilograms or multiples for each of the following:</p> <ul style="list-style-type: none"> • NOX • SOX • Persistent organic pollutants (POP) • Volatile organic compounds (VOC) • Hazardous air pollutants (HAP) • Particulate matter (PM) • Other standard categories of air emissions identified in relevant regulations <p>b. Report standards, methodologies, and assumptions used.</p> <p>c. Report the source of the emission factors used.</p> | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|------------------------------------|---|--|----------------------------------|------------------------|--|------------------------|---------------------------|--|
| ASPECT: EFFLUENTS AND WASTE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Waste | — | — | No |
| G4-EN22 | Total water discharge by quality and destination | <p>a. Report the total volume of planned and unplanned water discharges by:</p> <ul style="list-style-type: none"> • Destination • Quality of the water including treatment method • Whether it was reused by another organization <p>b. Report standards, methodologies, and assumptions used.</p> | No | — | — | — | — | No |
| G4-EN23 | Total weight of waste by type and disposal method | <p>a. Report the total weight of hazardous and non-hazardous waste, by the following disposal methods:</p> <ul style="list-style-type: none"> • Reuse • Recycling • Composting • Recovery, including energy recovery • Incineration (mass burn) • Deep well injection • Landfill • On-site storage • Other (to be specified by the organization) <p>b. Report how the waste disposal method has been determined:</p> <ul style="list-style-type: none"> • Disposed of directly by the organization or otherwise directly confirmed • Information provided by the waste disposal contractor • Organizational defaults of the waste disposal contractor <p>See the Financial Services Sector Disclosures document for more requirements.</p> | Yes | Full response for Core | Waste Key Statistics Table | — | — | Yes, 2015 CDP Response |
| G4-EN24 | Total number and volume of significant spills | <p>a. Report the total number and total volume of recorded significant spills.</p> <p>b. For spills that were reported in the organization's financial statements, report the additional following information for each such spill:</p> <ul style="list-style-type: none"> • Location of spill • Volume of spill • Material of spill, categorized by: <ul style="list-style-type: none"> – Oil spills (soil or water surfaces) – Fuel spills (soil or water surfaces) – Spills of wastes (soil or water surfaces) – Spills of chemicals (mostly soil or water surfaces) – Other (to be specified by the organization) <p>c. Report the impacts of significant spills.</p> | No | — | — | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--------------------------------------|--|---|----------------------------------|------------------------|--|------------------------|---------------------------|--------------------|
| G4-EN25 | Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally | <p>a. Report the total weight for each of the following:</p> <ul style="list-style-type: none"> • Hazardous waste transported • Hazardous waste imported • Hazardous waste exported • Hazardous waste treated <p>b. Report the percentage of hazardous waste shipped internationally.</p> | No | — | — | — | — | — |
| G4-EN26 | Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff | <p>a. Report water bodies and related habitats that are significantly affected by water discharges based on the criteria described in the Compilation section below, adding information on:</p> <ul style="list-style-type: none"> • Size of water body and related habitat • Whether the water body and related habitat is designated as a protected area (nationally or internationally) • Biodiversity value (such as total number of protected species) | No | — | — | — | — | — |
| ASPECT: PRODUCTS AND SERVICES | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | Managing Operational Impacts | — | — | — |
| G4-EN27 | Extent of impact mitigation of environmental impacts of products and services | <p>a. Report quantitatively the extent to which environmental impacts of products and services have been mitigated during the reporting period.</p> <p>b. If use-oriented figures are employed, report the underlying assumptions regarding consumption patterns or normalization factors.</p> | No | — | — | — | — | — |
| G4-EN28 | Percentage of products sold and their packaging materials that are reclaimed by category | <p>a. Report the percentage of reclaimed products and their packaging materials for each product category.</p> <p>b. Report how the data for this Indicator has been collected.</p> | No | — | — | — | — | — |
| ASPECT: COMPLIANCE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Risk Management | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--------------------------|---|---|----------------------------------|--|--|--|---|--------------------|
| G4-EN29 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations | <p>a. Report significant fines and non-monetary sanctions in terms of:</p> <ul style="list-style-type: none"> • Total monetary value of significant fines • Total number of non-monetary sanctions • Cases brought through dispute resolution mechanisms <p>b. Where organizations have not identified any non-compliance with laws or regulations, a brief statement of this fact is sufficient.</p> | Yes | <p>Full response for Core</p> <p>There were no significant fines or monetary sanctions associated with non-compliance of environmental laws and regulations in 2014 that would have a material adverse effect on our operations or ability to perform the services we offer.</p> | This GRI Index | — | — | No |
| ASPECT: TRANSPORT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | <p>Full response for Core</p> | Stakeholder Engagement Managing Operational Impacts Energy and GHG Emissions | — | — | No |
| G4-EN30 | Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce | <p>a. Report the significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce. Where quantitative data is not provided, report the reason.</p> <p>b. Report how the environmental impacts of transporting products, members of the organization's workforce, and other goods and materials are mitigated.</p> <p>c. Report the criteria and methodology used to determine which environmental impacts are significant.</p> | Yes | <p>Full response for Core</p> <p>We track greenhouse gas emissions related to our shipping (through FedEx) and transport (through Brinks) as well as employee travel and commuting.</p> | This GRI Index Energy and GHG Emissions Key Statistics Table 2015 CDP Response | GHG emissions related to our interoffice mail shipping | We do not currently have the means to calculate the greenhouse gas emissions related to our interoffice mail shipping due to how the mail is tracked with our vendor. | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---|--|----------------------------------|--|--|------------------------|---------------------------|--------------------|
| ASPECT: OVERALL | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed to meet Core | Environment | — | — | — |
| G4-EN31 | Total environmental protection expenditures and investments by type | <p>a. Report total environmental protection expenditures by:</p> <ul style="list-style-type: none"> • Waste disposal, emissions treatment, and remediation costs • Prevention and environmental management costs | No | Partial response, not needed to meet Core | 2015 CDP Response | — | — | — |
| ASPECT: SUPPLIER ENVIRONMENTAL ASSESSMENT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed to meet Core | Risk Management Environmentally Responsible Procurement Environmental Screening of Suppliers | — | — | — |
| G4-EN32 | Percentage of new suppliers that were screened using environmental criteria | <p>a. Report the percentage of new suppliers that were screened using environmental criteria.</p> | No | Full response, not needed to meet Core | Environmental Screening of Suppliers | — | — | — |
| G4-EN33 | Significant actual and potential negative environmental impacts in the supply chain and actions taken | <p>a. Report the number of suppliers subject to environmental impact assessments.</p> <p>b. Report the number of suppliers identified as having significant actual and potential negative environmental impacts.</p> <p>c. Report the significant actual and potential negative environmental impacts identified in the supply chain.</p> <p>d. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.</p> <p>e. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.</p> | No | Partial response, not needed to meet Core | Environmental Screening of Suppliers | — | — | — |
| ASPECT: ENVIRONMENTAL GRIEVANCE MECHANISMS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-EN34 | Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms | <p>a. Report the total number of grievances about environmental impacts filed through formal grievance mechanisms during the reporting period.</p> <p>b. Of the identified grievances, report how many were:</p> <ul style="list-style-type: none"> • Addressed during the reporting period • Resolved during the reporting period <p>c. Report the total number of grievances about environmental impacts filed prior to the reporting period that were resolved during the reporting period.</p> | No | Full response, not needed to meet Core No environmental grievances were identified in 2014. | This GRI Index | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--|---|---|----------------------------------|------------------------|--|------------------------|---------------------------|--------------------|
| CATEGORY: SOCIAL | | | | | | | | |
| SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK | | | | | | | | |
| ASPECT: EMPLOYMENT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| G4-LA1 | Total number and rates of new employee hires and employee turnover by age group, gender and region | <p>a. Report the total number and rate of new employee hires during the reporting period, by age group, gender and region.</p> <p>b. Report the total number and rate of employee turnover during the reporting period, by age group, gender and region.</p> | Yes | Full response for Core | <p>Employees</p> <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| G4-LA2 | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation | <p>a. Report the benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum:</p> <ul style="list-style-type: none"> • Life insurance • Health care • Disability and invalidity coverage • Parental leave • Retirement provision • Stock ownership • Others <p>b. Report the definition used for 'significant locations of operation'.</p> | Yes | Full response for Core | Talent Attraction, Retention, and Development | — | — | No |
| G4-LA3 | Return to work and retention rates after parental leave, by gender | <p>a. Report the total number of employees that were entitled to parental leave, by gender.</p> <p>b. Report the total number of employees that took parental leave, by gender.</p> <p>c. Report the total number of employees who returned to work after parental leave ended, by gender.</p> <p>d. Report the total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work, by gender.</p> <p>e. Report the return to work and retention rates of employees who took parental leave, by gender.</p> | No | — | — | — | — | — |
| ASPECT: LABOR/MANAGEMENT RELATIONS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Employees</p> | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|--|---|----------------------------------|---|--|------------------------|---------------------------|--------------------|
| G4-LA4 | Minimum notice periods regarding operational changes, including whether these are specified in collective agreements | <p>a. Report the minimum number of weeks' notice typically provided to employees and their elected representatives prior to the implementation of significant operational changes that could substantially affect them.</p> <p>b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.</p> | Yes | <p>Full response for Core</p> <p>Minimum notice period for significant operational changes is 45 days (6.4 weeks)</p> | This GRI Index | — | — | No |
| ASPECT: OCCUPATIONAL HEALTH AND SAFETY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach <p>See the Financial Services Sector Disclosures document for more requirements.</p> | No | <p>Partial response, not needed to meet Core</p> | Health, Safety, and Wellness | — | — | — |
| G4-LA5 | Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs | <p>a. Report the level at which each formal joint management-worker health and safety committee typically operates within the organization.</p> <p>b. Report the percentage of the total workforce represented in formal joint management-worker health and safety committees.</p> | No | <p>Partial response, not needed to meet Core</p> | Health, Safety, & Wellness | — | — | — |
| G4-LA6 | Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender | <p>a. Report types of injury, injury rate (IR), occupational diseases rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities, for the total workforce (that is, total employees plus supervised workers), by:</p> <ul style="list-style-type: none"> • Region • Gender <p>b. Report types of injury, injury rate (IR), occupational diseases rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities for independent contractors working on-site to whom the organization is liable for the general safety of the working environment, by:</p> <ul style="list-style-type: none"> • Region • Gender <p>c. Report the system of rules applied in recording and reporting accident statistics.</p> | No | — | — | — | — | — |
| G4-LA7 | Workers with high incidence or high risk of diseases related to their occupation | <p>a. Report whether there are workers who are involved in occupational activities who have a high incidence or high risk of specific diseases.</p> | No | — | — | — | — | — |
| G4-LA8 | Health and safety topics covered in formal agreements with trade unions | <p>a. Report whether formal agreements (either local or global) with trade unions cover health and safety.</p> <p>b. If yes, report the extent, as a percentage, to which various health and safety topics are covered by these agreements.</p> | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--|--|---|----------------------------------|------------------------|--|------------------------|---------------------------|--------------------|
| ASPECT: TRAINING AND EDUCATION | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| G4-LA9 | Average hours of training per year per employee by gender, and by employee category | <p>a. Report the average hours of training that the organization's employees have undertaken during the reporting period, by:</p> <ul style="list-style-type: none"> • Gender • Employee category | Yes | Full response for Core | <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| G4-LA10 | Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings | <p>a. Report on the type and scope of programs implemented and assistance provided to upgrade employee skills.</p> <p>b. Report on the transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.</p> | Yes | Full response for Core | <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| G4-LA11 | Percentage of employees receiving regular performance and career development reviews, by gender and by employee category | <p>a. Report the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.</p> | Yes | Full response for Core | <p>Talent Attraction, Retention, and Development</p> | — | — | No |
| ASPECT: DIVERSITY AND EQUAL OPPORTUNITY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Diversity and Inclusion</p> | — | — | No |
| G4-LA12 | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity | <p>a. Report the percentage of individuals within the organization's governance bodies in each of the following diversity categories:</p> <ul style="list-style-type: none"> • Gender • Age group: under 30 years old, 30-50 years old, over 50 years old • Minority groups • Other indicators of diversity where relevant <p>b. Report the percentage of employees per employee category in each of the following diversity categories:</p> <ul style="list-style-type: none"> • Gender • Age group: under 30 years old, 30-50 years old, over 50 years old • Minority groups • Other indicators of diversity where relevant | Yes | Full response for Core | <p>Corporate Governance</p> <p>Diversity and Inclusion</p> | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--|--|--|----------------------------------|------------------------|--|---|---|--------------------|
| ASPECT: EQUAL REMUNERATION FOR WOMEN AND MEN | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Partial response | Stakeholder Engagement Talent Attraction, Retention, & Development | Information not included on the mechanisms for evaluating the effectiveness of the management approach and the results of the evaluation of the management approach | Comerica is currently evaluating this issue in more depth and does not have sufficient data to provide a more detailed response at this time. | No |
| G4-LA13 | Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation | <p>a. Report the ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.</p> <p>b. Report the definition used for 'significant locations of operation'.</p> | Yes | No response | — | Requested metric not provided in report | Comerica is currently evaluating this issue in more depth and does not have sufficient data to provide a more detailed response at this time. | No |
| ASPECT: SUPPLIER ASSESSMENT FOR LABOR PRACTICES | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | Risk Management Supply Chain | — | — | — |
| G4-LA14 | Percentage of new suppliers that were screened using labor practices criteria | a. Report the percentage of new suppliers that were screened using labor practices criteria. | No | — | — | — | — | — |
| G4-LA15 | Significant actual and potential negative impacts for labor practices in the supply chain and actions taken | <p>a. Report the number of suppliers subject to impact assessments for labor practices.</p> <p>b. Report the number of suppliers identified as having significant actual and potential negative impacts for labor practices.</p> <p>c. Report the significant actual and potential negative impacts for labor practices identified in the supply chain.</p> <p>d. Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which improvements were agreed upon as a result of assessment.</p> <p>e. Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which relationships were terminated as a result of assessment, and why.</p> | No | — | — | — | — | — |
| ASPECT: LABOR PRACTICES GRIEVANCE MECHANISMS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Employee Engagement | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | Page Number (or Link) | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|-----------------------------------|---|---|----------------------------------|---|---|------------------------|---------------------------|--------------------|
| G4-LA16 | Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms | <p>a. Report the total number of grievances about labor practices filed through formal grievance mechanisms during the reporting period.</p> <p>b. Of the identified grievances, report how many were:</p> <ul style="list-style-type: none"> • Addressed during the reporting period • Resolved during the reporting period <p>c. Report the total number of grievances about labor practices filed prior to the reporting period that were resolved during the reporting period.</p> | Yes | Full response for Core | Employee Engagement | — | — | No |
| SUB-CATEGORY: HUMAN RIGHTS | | | | | | | | |
| ASPECT: INVESTMENT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed to meet Core | Risk Management Human Rights | — | — | — |
| G4-HR1 | Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | <p>a. Report the total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.</p> <p>b. Report the definition of 'significant investment agreements' used by the organization.</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p> | No | Partial response, not needed to meet Core | Human Rights | — | — | — |
| G4-HR2 | Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained | <p>a. Report the total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.</p> <p>b. Report the percentage of employees in the reporting period trained in human rights policies or procedures concerning aspects of human rights that are relevant to operations.</p> | No | — | — | — | — | — |
| ASPECT: NON-DISCRIMINATION | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed for Core | Human Rights | — | — | — |
| G4-HR3 | Total number of incidents of discrimination and corrective actions taken | <p>a. Report the total number of incidents of discrimination during the reporting period.</p> <p>b. Report the status of the incidents and the actions taken with reference to the following:</p> <ul style="list-style-type: none"> • Incident reviewed by the organization • Remediation plans being implemented • Remediation plans have been implemented and results reviewed through routine internal management review processes • Incident no longer subject to action | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|---|--|--|----------------------------------|----------|--|---|---|--|
| ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-HR4 | Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights | <p>a. Report operations and suppliers in which employee rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of:</p> <ul style="list-style-type: none"> • Type of operation (such as manufacturing plant) and supplier • Countries or geographical areas with operations and suppliers considered at risk <p>b. Report measures taken by the organization in the reporting period intended to support rights to exercise freedom of association and collective bargaining.</p> | No | — | — | — | — | — |
| ASPECT: CHILD LABOR | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-HR5 | Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor | <p>a. Report operations and suppliers considered to have significant risk for incidents of:</p> <ul style="list-style-type: none"> • Child labor • Young workers exposed to hazardous work <p>b. Report operations and suppliers considered to have significant risk for incidents of child labor either in terms of:</p> <ul style="list-style-type: none"> • Type of operation (such as manufacturing plant) and supplier • Countries or geographical areas with operations and suppliers considered at risk <p>c. Report measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.</p> | No | — | — | — | — | — |
| ASPECT: FORCED OR COMPULSORY LABOR | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|-----------------------------------|--|---|----------------------------------|----------|--|------------------------|---------------------------|--------------------|
| G4-HR6 | Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor | <p>a. Report operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of:</p> <ul style="list-style-type: none"> • Type of operation (such as manufacturing plant) and supplier • Countries or geographical areas with operations and suppliers considered at risk <p>b. Report measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.</p> | No | — | — | — | — | — |
| ASPECT: SECURITY PRACTICES | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-HR7 | Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations | <p>a. Report the percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security.</p> <p>b. Report whether training requirements also apply to third party organizations providing security personnel.</p> | No | — | — | — | — | — |
| ASPECT: INDIGENOUS RIGHTS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-HR8 | Total number of incidents of violations involving rights of indigenous peoples and actions taken | <p>a. Report the total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period.</p> <p>b. Report the status of the incidents and actions taken with reference to:</p> <ul style="list-style-type: none"> • Incident reviewed by the organization • Remediation plans being implemented • Remediation plans have been implemented and results reviewed through routine internal management review processes • Incident no longer subject to action | No | — | — | — | — | — |
| ASPECT: ASSESSMENT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|--|--|--|----------------------------------|---|--|---|---|--|
| G4-HR9 | Total number and percentage of operations that have been subject to human rights reviews or impact assessments | a. Report the total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country. | No | — | — | — | — | — |
| ASPECT: SUPPLIER HUMAN RIGHTS ASSESSMENT | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-HR10 | Percentage of new suppliers that were screened using human rights criteria | a. Report the percentage of new suppliers that were screened using human rights criteria. | No | — | — | — | — | — |
| G4-HR11 | Significant actual and potential negative human rights impacts in the supply chain and actions taken | a. Report the number of suppliers subject to human rights impact assessments. b. Report the number of suppliers identified as having significant actual and potential negative human rights impacts. c. Report the significant actual and potential negative human rights impacts identified in the supply chain. d. Report the percentage of suppliers identified as having significant actual and potential negative human rights impacts with which improvements were agreed upon as a result of assessment. e. Report the percentage of suppliers identified as having significant actual and potential negative human rights impacts with which relationships were terminated as a result of assessment, and why. | No | — | — | — | — | — |
| ASPECT: HUMAN RIGHTS GRIEVANCE MECHANISMS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed to meet Core | Human Rights Employee Engagement | — | — | No |
| G4-HR12 | Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms | a. Report the total number of grievances about human rights impacts filed through formal grievance mechanisms during the reporting period. b. Of the identified grievances, report how many were: • Addressed during the reporting period • Resolved during the reporting period c. Report the total number of grievances about human rights impacts filed prior to the reporting period that were resolved during the reporting period. | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|----------------------------------|---|---|----------------------------------|------------------------|--|------------------------|---------------------------|--------------------|
| SUB-CATEGORY: SOCIETY | | | | | | | | |
| ASPECT: LOCAL COMMUNITIES | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Community | — | — | No |
| G4-S01 | Percentage of operations with implemented local community engagement, impact assessments, and development programs | <p>a. Report the percentage of operations with implemented local community engagement, impact assessments, and development programs, including the use of:</p> <ul style="list-style-type: none"> • Social impact assessments, including gender impact assessments, based on participatory processes • Environmental impact assessments and ongoing monitoring • Public disclosure of results of environmental and social impact assessments • Local community development programs based on local communities' needs • Stakeholder engagement plans based on stakeholder mapping • Broad based local community consultation committees and processes that include vulnerable groups • Works councils, occupational health and safety committees and other employee representation bodies to deal with impacts • Formal local community grievance processes | Yes | Full response for Core | Stakeholder Engagement Risk Management Improving Banking Access and Serving the Underbanked Community | — | — | No |
| G4-S02 | Operations with significant actual and potential negative impacts on local communities | <p>a. Report operations with significant actual and potential negative impacts on local communities, including:</p> <ul style="list-style-type: none"> • The location of the operations • The significant actual and potential negative impacts of operations | No | — | — | — | — | — |
| ASPECT: ANTI-CORRUPTION | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Business Ethics | — | — | No |
| G4-S03 | Total number and percentage of operations assessed for risks related to corruption and the significant risks identified | <p>a. Report the total number and percentage of operations assessed for risks related to corruption.</p> <p>b. Report the significant risks related to corruption identified through the risk assessment.</p> | Yes | Full response for Core | Business Ethics | — | — | No |

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|--|--|---|--|----------------------------------|------------------------|--|---|---|--|
| G4-S04 | Communication and training on anti-corruption policies and procedures | a. Report the total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region. b. Report the total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region. c. Report the total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. d. Report the total number and percentage of governance body members that have received training on anti-corruption, broken down by region. e. Report the total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region. | | Yes | Full response for Core | Business Ethics | — | — | No |
| G4-S05 | Confirmed incidents of corruption and actions taken | a. Report the total number and nature of confirmed incidents of corruption. b. Report the total number of confirmed incidents in which employees were dismissed or disciplined for corruption. c. Report the total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. d. Report public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases. | | Yes | Full response for Core | Business Ethics | — | — | No |
| ASPECT: PUBLIC POLICY | | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | | Yes | Full response for Core | Stakeholder Engagement Public Policy | — | — | No |
| G4-S06 | Total value of political contributions by country and recipient/beneficiary | a. Report the total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary. b. Report how the monetary value of in-kind contributions was estimated, if applicable. | | Yes | Full response for Core | Public Policy | — | — | No |
| ASPECT: ANTI-COMPETITIVE BEHAVIOR | | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | | Yes | Full response for Core | Stakeholder Engagement Improving Banking Access and Serving the Underbanked | — | — | No |
| G4-S07 | Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes | a. Report the total number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant. b. Report the main outcomes of completed legal actions, including any decisions or judgments. | | Yes | Full response for Core | Improving Banking Access and Serving the Underbanked | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---|--|----------------------------------|--|--|------------------------|---------------------------|--------------------|
| ASPECT: COMPLIANCE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Risk Management</p> | — | — | No |
| G4-S08 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations | <p>a. Report significant fines and non-monetary sanctions in terms of:</p> <ul style="list-style-type: none"> • Total monetary value of significant fines • Total number of non-monetary sanctions • Cases brought through dispute resolution mechanisms <p>b. If the organization has not identified any non-compliance with laws or regulations, a brief statement of this fact is sufficient.</p> <p>c. Report the context against which significant fines and non-monetary sanctions were incurred.</p> | Yes | <p>Full response for Core</p> <p>No significant fines or non-monetary sanctions for non-compliance with laws or regulations in 2014 that would have a material adverse effect on our operations or ability to perform the services we offer.</p> | <p>Economic Impact</p> <p>2014 Annual Report</p> <p>This GRI Index</p> | — | — | No |
| ASPECT: SUPPLIER ASSESSMENT FOR IMPACTS ON SOCIETY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | Partial response, not needed to meet Core | <p>Risk Management</p> | — | — | — |
| G4-S09 | Percentage of new suppliers that were screened using criteria for impacts on society | a. Report the percentage of new suppliers that were screened using criteria for impacts on society. | No | — | — | — | — | — |
| G4-S010 | Significant actual and potential negative impacts on society in the supply chain and actions taken | <p>a. Report the number of suppliers subject to assessments for impacts on society.</p> <p>b. Report the number of suppliers identified as having significant actual and potential negative impacts on society.</p> <p>c. Report the significant actual and potential negative impacts on society identified in the supply chain.</p> <p>d. Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which improvements were agreed upon as a result of assessment.</p> <p>e. Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which relationships were terminated as a result of assessment, and why.</p> | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|--|---|---|----------------------------------|----------|--|------------------------|---------------------------|--------------------|
| ASPECT: GRIEVANCE MECHANISMS FOR IMPACTS ON SOCIETY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-S011 | Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms | <p>a. Report the total number of grievances about impacts on society filed through formal grievance mechanisms during the reporting period.</p> <p>b. Of the identified grievances, report how many were:</p> <ul style="list-style-type: none"> • Addressed during the reporting period • Resolved during the reporting period <p>c. Report the total number of grievances about impacts on society filed prior to the reporting period that were resolved during the reporting period.</p> | No | — | — | — | — | — |
| SUB-CATEGORY: PRODUCT RESPONSIBILITY | | | | | | | | |
| ASPECT: CUSTOMER HEALTH AND SAFETY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | No | — | — | — | — | — |
| G4-PR1 | Percentage of significant product and service categories for which health and safety impacts are assessed for improvement | <p>a. Report the percentage of significant product and service categories for which health and safety impacts are assessed for improvement.</p> | No | — | — | — | — | — |
| G4-PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes | <p>a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services within the reporting period, by:</p> <ul style="list-style-type: none"> • Incidents of non-compliance with regulations resulting in a fine or penalty • Incidents of non-compliance with regulations resulting in a warning • Incidents of non-compliance with voluntary codes <p>b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.</p> | No | — | — | — | — | — |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---|---|----------------------------------|---|--|------------------------|---------------------------|--------------------|
| ASPECT: PRODUCT AND SERVICE LABELING | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Business Ethics Responsible Business Practices Customer Protection and Cybersecurity Understanding and Supporting Our Customers Improving Banking Access and Serving the Underbanked | — | — | No |
| G4-PR3 | Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements | <p>a. Report whether the following product and service information is required by the organization's procedures for product and service information and labeling:</p> <ul style="list-style-type: none"> • The sourcing of components of the product or service • Content, particularly with regard to substances that might produce an environmental or social impact • Safe use of the product or service • Disposal of the product and environmental/social impacts • Other (explain) <p>b. Report the percentage of significant product or service categories covered by and assessed for compliance with such procedures.</p> | No | — | — | — | — | — |
| G4-PR4 | Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes | <p>a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by:</p> <ul style="list-style-type: none"> • Incidents of non-compliance with regulations resulting in a fine or penalty • Incidents of non-compliance with regulations resulting in a warning • Incidents of non-compliance with voluntary codes <p>b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.</p> | Yes | Full response for Core No incidents of non-compliance with regulations or voluntary codes concerning product and service information and labeling in 2014 that would have a material adverse effect on our operations or ability to perform the services we offer. | This GRI Index | — | — | No |
| G4-PR5 | Results of surveys measuring customer satisfaction | <p>a. Report the results or key conclusions of customer satisfaction surveys (based on statistically relevant sample sizes) conducted in the reporting period relating to information about:</p> <ul style="list-style-type: none"> • The organization as a whole • A major product or service category • Significant locations of operation | Yes | Partial response, not needed to meet Core | Understanding and Supporting Our Customers | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|--|--|----------------------------------|---|--|------------------------|---------------------------|--------------------|
| ASPECT: MARKETING COMMUNICATIONS | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Improving Banking Access and Serving the Underbanked</p> | — | — | No |
| G4-PR6 | Sale of banned or disputed products | <p>a. Report whether the organization sells products that are:</p> <ul style="list-style-type: none"> • Banned in certain markets • The subject of stakeholder questions or public debate <p>b. Report how the organization has responded to questions or concerns regarding these products.</p> | No | — | — | — | — | No |
| G4-PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes | <p>a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by:</p> <ul style="list-style-type: none"> • Incidents of non-compliance with regulations resulting in a fine or penalty • Incidents of non-compliance with regulations resulting in a warning • Incidents of non-compliance with voluntary codes <p>b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.</p> | Yes | Full response for Core No incidents of non-compliance with regulations or voluntary codes concerning marketing communications in 2014 that would have a material adverse effect on our operations or ability to perform the services we offer. | This GRI Index | — | — | No |
| ASPECT: CUSTOMER PRIVACY | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | <p>Stakeholder Engagement</p> <p>Customer Protection and Cybersecurity</p> | — | — | No |
| G4-PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data | <p>a. Report the total number of substantiated complaints received concerning breaches of customer privacy, categorized by:</p> <ul style="list-style-type: none"> • Complaints received from outside parties and substantiated by the organization • Complaints from regulatory bodies <p>b. Report the total number of identified leaks, thefts, or losses of customer data.</p> <p>c. If the organization has not identified any substantiated complaints, a brief statement of this fact is sufficient.</p> | Yes | Full response for Core | Customer Protection and Cybersecurity | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|--|---|----------------------------------|------------------------------|---|------------------------|---------------------------|--------------------|
| ASPECT: COMPLIANCE | | | | | | | | |
| G4-DMA | Generic Disclosures on Management Approach | <p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach | Yes | Full response for Core | Stakeholder Engagement Risk Management Responsible Business Practices | — | — | No |
| FINANCIAL SERVICES SECTOR | | | | | | | | |
| ASPECT: PRODUCT PORTFOLIO | | | | | | | | |
| FS1 (now part of Product Portfolio DMA) | Policies with specific environmental and social components applied to business lines. | <ul style="list-style-type: none"> • Policies and the body (e.g., Board of Directors) or department that approved it; • Features of the policies (e.g., content, business lines covered, geographical areas, specific standards referenced etc.); • Key risks/opportunities/impacts that each policy is intended to address; • Which policies are publicly available and where to find these policies; • How policies influence decision-making about existing or future products/services and in engagement with stakeholders | Yes | DMA (Full response for Core) | Stakeholder Engagement Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | — | — | No |
| FS2 (now part of Product Portfolio DMA) | Procedures for assessing and screening environmental and social risks in business lines. | <ul style="list-style-type: none"> • The process and procedures used to screen and assess environmental and social risks, including the use of third-party, non-client consultants or other information sources for identifying and assessing risks. Where these relate to specific policies reported under Policies with specific environmental and social components applied to business lines (former FS1), this should be noted; • The roles of the departments or committees responsible for implementing and monitoring the environmental and social risk assessment procedures; • How outcomes influence transaction decisions (e.g., decision to decline or approve transaction, addition of preferential conditions, adding performance standards to the transaction, establishing monitor requirements, etc.); and • The thresholds applied to determine whether environmental and social risk assessment is needed, including any variations by geography or across different products/services. | Yes | DMA (Full response for Core) | Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---|---|----------------------------------|------------------------------|---|------------------------|--|--------------------|
| FS3 (now part of Product Portfolio DMA) | Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements. | <ul style="list-style-type: none"> The method(s) used for tracking clients' fulfillment of agreed environmental and social improvement objectives; The form of this monitoring, including the frequency and duration of monitoring; and How non-compliance with agreements is addressed and the procedures that are undertaken following any breach of agreement or transaction conditions | Yes | DMA (Full response for Core) | Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | — | — | No |
| FS4 (now part of Product Portfolio DMA) | Processes for staff competency to implement environmental and social. | <p>Processes for staff competency the reporting organization uses to ensure staff managing environmental and social risks and opportunities have the competencies to implement the environmental and social policies and procedures as applied to business lines; and</p> <ul style="list-style-type: none"> The recipients of these activities, the focus of the activities and whether the activities undertaken (e.g. training, mentoring etc.) are part of core training, additional or stand-alone/one-off training. | Yes | DMA (Full response for Core) | Business Ethics Risk Management | — | — | No |
| FS5 (now part of Product Portfolio DMA) | Interactions with clients/investees/business partners regarding environmental and social risks and opportunities. | <ul style="list-style-type: none"> Summary of interactions undertaken including primary topics, goals, and outcomes; The departments and/or organizations undertaking interactions; Methods adopted to prioritize topics and targets for interactions; Methods employed (e.g., face-to-face meetings, questionnaires); and The process for monitoring and following up the outcome of interactions. | Yes | DMA (Full response for Core) | Stakeholder Engagement Risk Management 2015 CDP Response | — | — | No |
| FS6 | Percentage of the portfolio for business lines by specific region, size (e.g. Micro/SME/Large) and by sector | Report the following: <ul style="list-style-type: none"> The value of the portfolio for each business line as a percentage of the total or as a total monetary value based on "on-balance sheet" assets; The approach used to determine whether a sector or region presents a potential high environmental or social impact; and Provide details of classifications used for regions, sizes and sectors. | Yes | Full response for Core | Risk Management 2014 Annual Report | — | — | No |
| FS7 | Monetary value of products and services designed to deliver a specific social benefit. | Report the following: List of products and services broken down by business line (retail banking, commercial and corporate banking, insurance) for each: <ul style="list-style-type: none"> Purpose, product description and, where relevant, the target social group; Monetary value (for products) or number of transactions or customers (for services); The proportion of this value to the total monetary value for each business line. | Yes | Partial response | Community Reinvestment and Development Understanding & Supporting Our Customers Improving Banking Access & Serving the Underbanked | — | We have provided examples of products and services that may offer a social benefit, but it is not a comprehensive listing of all Comerica products and services. | No |
| FS8 | Monetary value of products and services designed to deliver a specific environmental benefit. | Report the following: <ul style="list-style-type: none"> The total monetary value of specific environmental products and services by business line; and The proportion of this value to the total value of products and services for the business line. | Yes | Full response for Core | Supporting Environmentally Beneficial Companies and Projects 2014 Annual Report | — | — | No |

| Standard Disclosure | Standard Disclosure Title | <p>Disclosure Requirements</p> <p>The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.</p> | Is this material for our report? | Comments | <p>Page Number (or Link)</p> <p>Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.</p> | Identified Omission(s) | Reason(s) for Omission(s) | External Assurance |
|---|---|---|----------------------------------|------------------------------|--|------------------------|---------------------------|--------------------|
| | | ASPECT: AUDIT | Yes | | Stakeholder Engagement | | | |
| FS9 (now part of Audit DMA) | of audits to assess implementation of environmental and social policies and risk assessment procedures. | ? Coverage and frequency Report the following for each business line: <ul style="list-style-type: none">• Whether the organization has implemented auditing systems for its environmental and social risk assessment policies;• Any exclusions or limitations to the audit coverage of regions or products and services;• Whether the audit(s) was carried out using internal/ external auditor(s);• The names of any standards utilized for the audit; and• Follow-up actions (if any) to overall findings of the audit(s). | Yes | DMA (Full response for Core) | Risk Management 2015 CDP Response | — | — | No |
| | | ASPECT: ACTIVE OWNERSHIP | No | — | Stakeholder Engagement | — | — | — |
| FS10 | Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues | <ul style="list-style-type: none">• Identify those departments across the reporting organisation that interact with companies on environmental or social issues across the institution's portfolio.• Identify the total number of companies across the institution's portfolio that were engaged through the interactions reported under Interactions with clients/ investees/business partners regarding environmental and social risks and opportunities (former FS5).• Quantify this engagement activity in terms of absolute numbers of companies engaged and the percentage of companies against the total number of companies in the portfolio. | No | — | — | — | — | — |
| FS11 | Percentage of assets subject to positive and negative environmental or social screening | <ul style="list-style-type: none">• Report separately the percentage and number of companies held in the institution's portfolio with which the reporting organization holds responsibility within the reporting organisation or within external fund managers for environmental and social screening of assets in the portfolio.• Determine how the reporting organisation uses screening and what classification is used (e.g. positive, negative, best-in-class etc.) to describe the types of screens applied.• Ensure that assets subject to an integrated screen (which includes 'environment' & 'social' as a factor) are included in calculating the percentages for this indicator.• Ensure that assets subject to an engagement approach only and not subject to a screening process (as defined above) are not included in the calculations.• Consider the ratio between own account investment and investment on behalf of a third party.• Report the breakdown of the value of total assets under management at the end of the reporting period | No | — | — | — | — | — |
| FS12 (now part of Active Ownership DMA) | Voting policy(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting | Report the following: <ul style="list-style-type: none">• If any guidelines exist for voting on environmental or social issues, describe the primary aspects covered and explain circumstances under which significant deviations are allowed;• If these voting guidelines only apply to subsidiaries in the organization, then this should be stated;• The location of any publicly available voting guidelines;• The location of any publicly available voting records; and• Summary of voting practices during the reporting period including explanation of significant deviations from voting policies. | No | — | — | — | — | — |
| FS13 | Access points in low-populated or economically disadvantaged areas by type. | Report the following: <ul style="list-style-type: none">• Total number and percentage of total FI points of access available in low-populated or economically disadvantaged areas by region and by type of access;• Provide context to this data in relation to overall access to financial services in the regions reported on/provide any benchmarks;• The percentage increase and/or decrease and absolute number of points of access in these geographic areas by type during the reporting period; and• The classification that the reporting organization has used to classify regions. | Yes | Full response for Core | Improving Banking Access & Serving the Underbanked | — | — | No |

| Standard Disclosure | Standard Disclosure Title | Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report. | | Is this material for our report? | Comments | Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found. | Identified Omission(s) In exceptional cases, if it is not possible to disclose certain required information, identify the information that has been omitted. | Reason(s) for Omission(s) In exceptional cases, if it is not possible to disclose certain required information, provide the reason for omission. | External Assurance Indicate if the Standard Disclosure has been externally assured. If yes, include the page reference for the External Assurance Statement in the report. |
|---|---|---|--|----------------------------------|------------------------------|--|---|---|--|
| FS14 | access to financial services for disadvantaged people. | <p>?Initiatives to improve</p> <ul style="list-style-type: none"> • The target disadvantaged group; • The degree to which it is applied across the institution (e.g., all locations vs. only one region, all products vs. only retail banking, etc.); and • Progress made against the initiative (e.g. % of ATMs that have been converted etc.). | | Yes | Full response for Core | Understanding and Supporting Our Customers Improving Banking Access & Serving the Underbanked | — | — | No |
| ASPECT: PRODUCT AND SERVICE LABELING | | | | | | | | | |
| FS15 (now part of Product and Service Labeling DMA) | ??Policies for the fair design and sale of financial products and services. | <p>Identify policies, principles and/or codes of conduct that have been designed to ensure that the interests of the institution and its employees are aligned to the interests of existing and potential customers. This could include:</p> <ul style="list-style-type: none"> • Product and service design policies, such as those which establish limitations of certain product features that could place the customer at undue risk (e.g. limitations on interest rates, roll-over features, fees, etc.); • Credit risk policies; • Conflict of interest policies (e.g. preventing situations where a personal interest could conflict with the interests of present or prospective customers such as remunerations packages); • Personal conduct policies; and • Employment policies, including terms and conditions of employment (i.e. as defined in employees contracts). | | Yes | DMA (Full response for Core) | Stakeholder Engagement Business Ethics | — | — | No |
| FS16 (now part of Product and Service Labeling DMA) | ?Initiatives to enhance financial literacy by type of beneficiary. | <ul style="list-style-type: none"> • Consider financial literacy initiatives to educate customers and other groups or communities on financial planning and management. • Consider the primary target group for each initiative. This may be defined in terms of demographic characteristics (e.g., youth groups, low-income individuals, immigrants, employees) or other criteria. • Report the following information for each initiative to enhance financial literacy: <ul style="list-style-type: none"> • Goals of the initiative, including subject areas targeted; • Main activities related to the initiative; and • Target group/beneficiary. | | Yes | DMA (Full response for Core) | Customer Protection and Cybersecurity Understanding and Supporting Our Customers Community Reinvestment and Development Philanthropy | — | — | No |

G3.1 Content Index - Financial Services Sector Supplement

STANDARD DISCLOSURES PART I: Profile Disclosures

1. Strategy and Analysis

| Profile Disclosure | Disclosure | Location of disclosure | G4 reference |
|--------------------|--|--|--------------|
| 1.1 | Statement from the most senior decision-maker of the organization. | Letter from our Chairman and CEO | G4-1 |
| 1.2 | Description of key impacts, risks, and opportunities. | | G4-2 |

2. Organizational Profile

| Profile Disclosure | Disclosure | Location of disclosure | G4 reference |
|--------------------|--|--|-----------------------------------|
| 2.1 | Name of the organization. | Company Profile | G4-3 |
| 2.2 | Primary brands, products, and/or services. | Company Profile | G4-4 |
| 2.3 | Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures. | About this Report Company Profile 2014 Annual Report | G4-17 |
| 2.4 | Location of organization's headquarters. | GRI G4 Index | G4-5 |
| 2.5 | Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report. | Company Profile | G4-6 |
| 2.6 | Nature of ownership and legal form. | Company Profile | G4-7 |
| 2.7 | Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries). | Company Profile | G4-8 |
| 2.8 | Scale of the reporting organization. | Company Profile Key Statistics Table | G4-9 |
| 2.9 | Significant changes during the reporting period regarding size, structure, or ownership. | Company Profile 2014 Annual Report | G4-13 |
| 2.10 | Awards received in the reporting period. | Letter from Our Chairman and CEO Company Profile | Standard Disclosure Deleted in G4 |

3. Report Parameters

| Profile Disclosure | Disclosure | Location of disclosure | G4 reference |
|--------------------|---|--|-----------------------------------|
| 3.1 | Reporting period (e.g., fiscal/calendar year) for information provided. | About this Report | G4-28 |
| 3.2 | Date of most recent previous report (if any). | About this Report | G4-29 |
| 3.3 | Reporting cycle (annual, biennial, etc.) | About this Report | G4-30 |
| 3.4 | Contact point for questions regarding the report or its contents. | About this Report | G4-31 |
| 3.5 | Process for defining report content. | Stakeholder Engagement | G4-18 |
| 3.6 | Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance. | Stakeholder Engagement | G4-20,G4-21 |
| 3.7 | State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope). | Stakeholder Engagement | |
| 3.8 | Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations. | Stakeholder Engagement | |
| 3.9 | Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols. | Not applicable. | Standard Disclosure Deleted in G4 |

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|------|--|---|-------|
| 3.10 | Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g.,mergers/acquisitions, change of base years/periods, nature of business, measurement methods). | GRI G4 Index | G4-22 |
| 3.11 | Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report. | About this Report | G4-23 |
| 3.12 | Table identifying the location of the Standard Disclosures in the report. | About this Report | G4-32 |
| 3.13 | Policy and current practice with regard to seeking external assurance for the report. | GRI G4 Index 2015 CDP Response | G4-33 |

4. Governance, Commitments, and Engagement

| Profile Disclosure | Disclosure | Location of disclosure | G4 reference |
|--------------------|--|---|---------------------|
| 4.1 | Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight. | Corporate Governance Corporate Governance Guidelines | G4-34, G4-38 |
| 4.2 | Indicate whether the Chair of the highest governance body is also an executive officer. | 2014 Annual Report Proxy Statement | G4-39 |
| 4.3 | For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members. | Corporate Governance Corporate Governance Guidelines Proxy Statement | G4-38 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body. | Approach to Sustainability Corporate Governance Corporate Governance Guidelines Proxy Statement | G4-37, G4-49, G4-53 |
| 4.5 | Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance). | Proxy Statement Corporate Governance | G4-51 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided. | Proxy Statement Corporate Governance Guidelines | G4-41 |
| 4.7 | Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity. | Proxy Statement Corporate Governance Guidelines | G4-40 |
| 4.8 | Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation. | Business Ethics Guidelines to Ethical Business Conduct Code of Business Conduct and Ethics for Employees Senior Financial Officer Code of Ethics Code of Business Conduct and Ethics for Members of the Board of Directors | G4-56 |
| 4.9 | Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles. | Approach to Sustainability Stakeholder Engagement Corporate Governance Guidelines | G4-45, G4-47 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance. | | G4-44 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organization. | Risk Management | G4-14 |

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|------|--|--|-------|
| 4.12 | Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses. | GRI G4 Index | G4-15 |
| 4.13 | Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic. | Risk Management Public Policy Community Reinvestment and Development Supplier Diversity Program | G4-16 |
| 4.14 | List of stakeholder groups engaged by the organization. | Stakeholder Engagement | G4-24 |
| 4.15 | Basis for identification and selection of stakeholders with whom to engage. | Stakeholder Engagement | G4-25 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group. | Approach to Sustainability Stakeholder Engagement | G4-26 |
| 4.17 | Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. | Stakeholder Engagement | G4-27 |

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

| G3.1 FSSS DMAs | Disclosure | Location of disclosure | G4 reference |
|----------------|--|--|--------------|
| DMA PS | Disclosure on Management Approach PS | | |
| Aspect | Product Portfolio | | |
| FS1 | Policies with specific environmental and social components applied to business lines. | Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | G4-DMA |
| FS2 | Procedures for assessing and screening environmental and social risks in business lines. | Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | G4-DMA |
| FS3 | Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions. | Risk Management Human Rights Environment Community Reinvestment and Development Environmental Screening of Suppliers | G4-DMA |
| FS4 | Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines. | Business Ethics Risk Management | G4-DMA |
| FS5 | Interactions with clients/investees/business partners regarding environmental and social risks and opportunities. | Stakeholder Engagement Risk Management 2015 CDP Response | G4-DMA |
| Aspect | Audit | | |
| FS9 | Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures. | Risk Management 2015 CDP Response | G4-DMA |
| Aspect | Active Ownership | | |
| FS12 | Voting policy(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting. | | G4-DMA |

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|---------|--|---|--------|
| DMA EC | Disclosure on Management Approach EC | | |
| Aspects | Economic Performance | Stakeholder Engagement Economic Impact Community | G4-DMA |
| | Market presence | | G4-DMA |
| Aspects | Indirect economic impacts | Stakeholder Engagement Economic Impact Risk Management | G4-DMA |
| DMA EN | Disclosure on Management Approach EN | | |
| Aspects | Materials | Stakeholder Engagement Paper | G4-DMA |
| | Energy | Stakeholder Engagement Energy and GHG Emissions | G4-DMA |
| | Water | Stakeholder Engagement Water | G4-DMA |
| | Biodiversity | | G4-DMA |
| | Emissions, effluents and waste | Stakeholder Engagement Energy and GHG Emissions Waste | G4-DMA |
| | Products and services | Managing Operational Impacts | G4-DMA |
| | Compliance | Stakeholder Engagement Risk Management | G4-DMA |
| | Transport | Stakeholder Engagement Managing Operational Impacts Energy & GHG Emissions | G4-DMA |
| | Overall | Environment | G4-DMA |
| DMA LA | Disclosure on Management Approach LA | | |
| Aspects | Employment | Stakeholder Engagement Talent Attraction, Retention, and Development | G4-DMA |
| | Labor/management relations | Stakeholder Engagement Employees | G4-DMA |
| | Occupational health and safety | Health, Safety, and Wellness | G4-DMA |
| | Training and education | Stakeholder Engagement Talent Attraction, Retention, and Development | G4-DMA |
| | Diversity and equal opportunity | Stakeholder Engagement Diversity and Inclusion | G4-DMA |
| | Equal remuneration for women and men | Stakeholder Engagement Talent Attraction, Retention, and Development | G4-DMA |
| DMA HR | Disclosure on Management Approach HR | | |
| Aspects | Investment and procurement practices | Risk Management Human Rights | G4-DMA |
| | Non-discrimination | Human Rights | G4-DMA |
| | Freedom of association and collective bargaining | | G4-DMA |
| | Child labor | | G4-DMA |

| | | | |
|---------|---|---|--------------------|
| | Prevention of forced and compulsory labor | | G4-DMA |
| | Security practices | | G4-DMA |
| | Indigenous rights | | G4-DMA |
| | Assessment | | G4-DMA |
| | Remediation | | Not included in G4 |
| DMA SO | Disclosure on Management Approach SO | | |
| Aspects | Local communities | Stakeholder Engagement Community | G4-DMA |
| | Corruption | Stakeholder Engagement Business Ethics | G4-DMA |
| | Public policy | Stakeholder Engagement Public Policy | G4-DMA |
| | Anti-competitive behavior | Stakeholder Engagement Improving Banking Access and Serving the Underbanked | G4-DMA |
| | Compliance | Stakeholder Engagement Risk Management | G4-DMA |
| DMA PR | Disclosure on Management Approach PR | | |
| Aspects | Customer health and safety | | G4-DMA |
| | Product and service labeling | Stakeholder Engagement Business Ethics Responsible Business Practices Customer Protection and Cybersecurity Understanding and Supporting Our Customers Improving Banking Access and Serving the Underbanked | G4-DMA |
| | FS15: Policies for the fair design and sale of financial products and services. | Stakeholder Engagement Business Ethics | G4-DMA |
| | Marketing communications | Stakeholder Engagement Improving Banking Access and Serving the Underbanked | G4-DMA |
| | Customer privacy | Stakeholder Engagement Customer Protection and Cybersecurity | G4-DMA |
| | Compliance | Stakeholder Engagement Risk Management Responsible Business Practices | G4-DMA |

| STANDARD DISCLOSURES PART III: Performance Indicators | | | |
|---|---|--|--------------|
| Product and Service Impact | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Product portfolio | | |
| FS6 | Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector. | Risk Management 2014 Annual Report | G4-FS6 |
| FS7 | Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose. | Community Reinvestment and Development | G4-FS7 |
| FS8 | Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose. | Supporting Environmentally Beneficial Companies and Projects 2014 Annual Report | G4-FS8 |
| Aspect | Active Ownership | | |
| FS10 | Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues. | | G4-FS10 |
| FS11 | Percentage of assets subject to positive and negative environmental or social screening. | | G4-FS11 |
| Economic | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Economic performance | | |
| EC1 | Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments. | Key Statistics Table 2014 Annual Report Community | G4-EC1 |
| EC2 | Financial implications and other risks and opportunities for the organization's activities due to climate change. | Risk Management Climate Change 2015 CDP Response | G4-EC2 |
| EC3 | Coverage of the organization's defined benefit plan obligations. | | G4-EC3 |
| EC4 | Significant financial assistance received from government. | | G4-EC4 |
| Aspect | Market presence | | |
| EC5 | Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation. | | G4-EC5 |
| EC6 | Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation. | Supply Chain | G4-EC9 |
| EC7 | Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation. | | G4-EC6 |
| Aspect | Indirect economic impacts | | |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. | Stakeholder Engagement Economic Impact Improving Banking Access and Serving the Underbanked Supporting Environmentally Beneficial Companies and Projects Community Reinvestment and Development Philanthropy Volunteerism Supply Chain | G4-EC7 |

| | | | |
|----------------------|---|---|-------------------|
| EC9 | Understanding and describing significant indirect economic impacts, including the extent of impacts. | Economic Impact Improving Banking Access and Serving the Underbanked Supporting Environmentally Beneficial Companies and Projects Community Reinvestment and Development Philanthropy Volunteerism Supply Chain | G4-EC8 |
| Environmental | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Materials | | |
| EN1 | Materials used by weight or volume. | Paper Key Statistics Table | G4-EN1 |
| EN2 | Percentage of materials used that are recycled input materials. | Paper Key Statistics Table | G4-EN2 |
| Aspect | Energy | | |
| EN3 | Direct energy consumption by primary energy source. | Energy & GHG Emissions Key Statistics Table GRI G4 Index 2015 CDP Response | G4-EN3 |
| EN4 | Indirect energy consumption by primary source. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN3 |
| EN5 | Energy saved due to conservation and efficiency improvements. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN6 |
| EN6 | Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN7 |
| EN7 | Initiatives to reduce indirect energy consumption and reductions achieved. | Energy & GHG Emissions 2015 CDP Response | G4-EN6 |
| Aspect | Water | | |
| EN8 | Total water withdrawal by source. | Water Stewardship Key Statistics Table GRI G4 Index | G4-EN8 |
| EN9 | Water sources significantly affected by withdrawal of water. | | G4-EN9 |
| EN10 | Percentage and total volume of water recycled and reused. | | G4-EN10 |
| Aspect | Biodiversity | | |
| EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. | | G4-EN11 |
| EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas. | | G4-EN12 |
| EN13 | Habitats protected or restored. | | G4-EN13 |
| EN14 | Strategies, current actions, and future plans for managing impacts on biodiversity. | | Moved to guidance |
| EN15 | Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk. | | G4-EN14 |

| Aspect | Emissions, effluents and waste | | |
|---|---|--|------------------|
| EN16 | Total direct and indirect greenhouse gas emissions by weight. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN15, G4-EN16 |
| EN17 | Other relevant indirect greenhouse gas emissions by weight. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN17 |
| EN18 | Initiatives to reduce greenhouse gas emissions and reductions achieved. | Energy & GHG Emissions Key Statistics Table 2015 CDP Response | G4-EN19 |
| EN19 | Emissions of ozone-depleting substances by weight. | | G4-EN20 |
| EN20 | NOx, SOx, and other significant air emissions by type and weight. | | G4-EN21 |
| EN21 | Total water discharge by quality and destination. | | G4-EN22 |
| EN22 | Total weight of waste by type and disposal method. | Waste Key Statistics Table | G4-EN23 |
| EN23 | Total number and volume of significant spills. | | G4-EN-24 |
| EN24 | Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally. | | G4-EN25 |
| EN25 | Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff. | | G4-EN26 |
| Aspect | Products and services | | |
| EN26 | Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation. | Managing Operational Impacts | G4-EN27 |
| EN27 | Percentage of products sold and their packaging materials that are reclaimed by category. | Managing Operational Impacts | G4-EN28 |
| Aspect | Compliance | | |
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations. | GRI G4 Index | G4-EN29 |
| Aspect | Transport | | |
| EN29 | Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce. | Energy and GHG Emissions Key Statistics Table GRI G4 Index 2015 CDP Response | G4-EN30 |
| Aspect | Overall | | |
| EN30 | Total environmental protection expenditures and investments by type. | 2015 CDP Response | G4-EN31 |
| Social: Labor Practices and Decent Work | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Employment | | |
| LA1 | Total workforce by employment type, employment contract, and region, broken down by gender. | Employees Key Statistics Table GRI G4 Index Diversity & Inclusion | G4-10 |
| LA2 | Total number and rate of new employee hires and employee turnover by age group, gender, and region. | Employees Talent Attraction, Retention, and Development | G4-LA1 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations. | Talent Attraction, Retention, and Development | G4-LA2 |

| LA15 | Return to work and retention rates after parental leave, by gender. | | G4-LA3 |
|-----------------------------|--|---|--------------|
| Aspect | Labor/management relations | | |
| LA4 | Percentage of employees covered by collective bargaining agreements. | GRI G4 Index | G4-11 |
| LA5 | Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements. | GRI G4 Index | G4-LA4 |
| Aspect | Occupational health and safety | | |
| LA6 | Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. | Health, Safety, and Wellness | G4-LA5 |
| LA7 | Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender. | | G4-LA6 |
| LA8 | Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases. | Health, Safety, and Wellness | G4-LA7 |
| LA9 | Health and safety topics covered in formal agreements with trade unions. | Health, Safety, and Wellness | G4-LA8 |
| Aspect | Training and education | | |
| LA10 | Average hours of training per year per employee by gender, and by employee category. | Talent Attraction, Retention, and Development | G4-LA9 |
| LA11 | Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings. | Talent Attraction, Retention, and Development | G4-LA10 |
| LA12 | Percentage of employees receiving regular performance and career development reviews, by gender. | Talent Attraction, Retention, and Development | G4-LA11 |
| Aspect | Diversity and equal opportunity | | |
| LA13 | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity. | Corporate Governance Diversity and Inclusion | G4-LA12 |
| Aspect | Equal remuneration for women and men | | |
| LA14 | Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation. | | G4-LA13 |
| Social: Human Rights | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Investment and procurement practices | | |
| HR1 | Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening. | Human Rights | G4-HR1 |
| HR2 | Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken. | Human Rights | G4-HR10 |
| HR3 | Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained. | | G4-HR2 |
| Aspect | Non-discrimination | | |
| HR4 | Total number of incidents of discrimination and corrective actions taken. | | G4-HR3 |
| Aspect | Freedom of association and collective bargaining | | |
| HR5 | Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights. | | G4-HR4 |

| Aspect | Child labor | | |
|-----------------|---|---|-----------------------------------|
| HR6 | Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor. | | G4-HR5 |
| Aspect | Prevention of forced and compulsory labor | | |
| HR7 | Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor. | | G4-HR6 |
| Aspect | Security practices | | |
| HR8 | Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations. | | G4-HR7 |
| Aspect | Indigenous rights | | |
| HR9 | Total number of incidents of violations involving rights of indigenous people and actions taken. | | G4-HR8 |
| Aspect | Assessment | | |
| HR10 | Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments. | | G4-HR9 |
| Aspect | Remediation | | |
| HR11 | Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms. | | G4-HR12 |
| Social: Society | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference |
| Aspect | Local communities | | |
| S01 (FSSS) | Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting. | Stakeholder Engagement Risk Management Improving Banking Access and Serving the Underbanked Community | G4-S01 |
| S01 (G3.1) | Percentage of operations with implemented local community engagement, impact assessments, and development programs. | Stakeholder Engagement Risk Management Improving Banking Access and Serving the Underbanked Community | G4-S01 |
| FS13 | Access points in low-populated or economically disadvantaged areas by type. | Improving Banking Access & Serving the Underbanked | G4-FS13 |
| FS14 | Initiatives to improve access to financial services for disadvantaged people. | Understanding and Supporting Our Customers Improving Banking Access & Serving the Underbanked | G4-FS14 |
| S09 | Operations with significant potential or actual negative impacts on local communities. | | G4-S02 |
| S010 | Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities. | | Standard disclosure deleted in G4 |
| Aspect | Corruption | | |
| S02 | Percentage and total number of business units analyzed for risks related to corruption. | Business Ethics | G4-S03 |
| S03 | Percentage of employees trained in organization's anti-corruption policies and procedures. | Business Ethics | G4-S04 |

| S04 | Actions taken in response to incidents of corruption. | | Business Ethics | G4-S05 |
|---------------------------------------|--|------------------------|---|-------------------|
| Aspect | Public policy | | | |
| S05 | Public policy positions and participation in public policy development and lobbying. | | Public Policy | Moved to guidance |
| S06 | Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country. | | Public Policy | G4-S06 |
| Aspect | Anti-competitive behavior | | | |
| S07 | Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes. | | Improving Banking Access and Serving the Underbanked | G4-S07 |
| Aspect | Compliance | | | |
| S08 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations. | | Economic Impact 2014 Annual Report GRI G4 Index | G4-S08 |
| Social: Product Responsibility | | | | |
| Indicator | Disclosure | Location of disclosure | G4 reference | |
| Aspect | Customer health and safety | | | |
| PR1 | Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures. | | | G4-PR1 |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes. | | | G4-PR2 |
| Aspect | Product and service labeling | | | |
| PR3 | Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements. | | | G4-PR3 |
| PR4 | Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes. | | GRI G4 Index | G4-PR4 |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. | | Understanding and Supporting Our Customers | G4-PR5 |
| FS16 | Initiatives to enhance financial literacy by type of beneficiary. | | Customer Protection and Cybersecurity Understanding and Supporting Our Customers Community Reinvestment and Development Philanthropy | G4-DMA |
| Aspect | Marketing communications | | | |
| PR6 | Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. | | Improving Banking Access and Serving the Underbanked | G4-PR6 (modified) |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes. | | GRI G4 Index | G4-PR7 |
| Aspect | Customer privacy | | | |
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data. | | Customer Protection and Cybersecurity | G4-PR8 |
| Aspect | Compliance | | | |
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. | | GRI G4 Index | G4-PR9 |