



Raise Your Expectations™

# 2021

## Corporate Responsibility Report

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A comprehensive review of Comerica's environmental, social and governance practices and progress

Expectations

Any statements in this document that are not historical facts are forward-looking statements as defined in the Private Securities Litigation Reform Act of 1995. Words such as "anticipates," "believes," "contemplates," "feels," "expects," "estimates," "seeks," "strives," "plans," "intends," "outlook," "forecast," "position," "target," "mission," "assume," "achievable," "potential," "strategy," "goal," "aspiration," "opportunity," "initiative," "outcome," "continue," "remain," "maintain," "on track," "trend," "objective," "looks forward," "projects," "models" and variations of such words and similar expressions, or future or conditional verbs such as "will," "would," "should," "could," "might," "can," "may" or similar expressions, as they relate to Comerica or its management, are intended to identify forward-looking statements. These forward-looking statements are predicated on the beliefs and assumptions of Comerica's management based on information known to Comerica's management as of the date of this document and do not purport to speak as of any other date. Forward-looking statements may include descriptions of plans and objectives of Comerica's management for future or past operations, products or services, and forecasts of Comerica's revenue, earnings or other measures of economic performance, including statements of profitability, business segments and subsidiaries as well as estimates of credit trends and global stability. Such statements reflect the view of Comerica's management as of this date with respect to future events and are subject to risks and uncertainties. Should one or more of these risks materialize or should underlying beliefs or assumptions prove incorrect, Comerica's actual results could differ materially from those discussed. Factors that could cause or contribute to such differences include credit risks (unfavorable developments concerning credit quality; declines or other changes in the businesses or industries of Comerica's customers; and changes in customer behavior); market risks (changes in monetary and fiscal policies; fluctuations in interest rates and their impact on deposit pricing; and transitions away from LIBOR towards new interest rate benchmarks); liquidity risks (Comerica's ability to maintain adequate sources of funding and liquidity; reductions in Comerica's credit rating; and the interdependence of financial service companies); technology risks (cybersecurity risks and heightened legislative and regulatory focus on cybersecurity and data privacy); operational risks (operational, systems or infrastructure failures; reliance on other companies to provide certain key components of business infrastructure; the impact of legal and regulatory proceedings or determinations; losses due to fraud; and controls and procedures failures); compliance risks (changes in regulation or oversight, or changes in Comerica's status with respect to existing regulations or oversight; the effects of stringent capital requirements; and the impacts of future legislative, administrative or judicial changes to tax regulations); strategic risks (damage to Comerica's reputation; Comerica's ability to utilize technology to efficiently and effectively develop, market and deliver new products and services; competitive product and pricing pressures among financial institutions within Comerica's markets; the implementation of Comerica's strategies and business initiatives; management's ability to maintain and expand customer relationships; management's ability to retain key officers and employees; and any future strategic acquisitions or divestitures); and other general risks (impacts from the COVID-19 global pandemic; changes in general economic, political or industry conditions; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events; changes in accounting standards; the critical nature of Comerica's accounting policies; and the volatility of Comerica's stock price). Comerica cautions that the foregoing list of factors is not all-inclusive. For discussion of factors that may cause actual results to differ from expectations, please refer to our filings with the Securities and Exchange Commission. In particular, please refer to "Item 1A. Risk Factors" beginning on page 13 of Comerica's Annual Report on Form 10-K for the year ended December 31, 2021. Forward-looking statements speak only as of the date they are made. Comerica does not undertake to update forward-looking statements to reflect facts, circumstances, assumptions or events that occur after the date the forward-looking statements are made. For any forward-looking statements made in this or in any other documents, Comerica claims the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995.

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\* The five elements of Comerica's ESG Platform

2021 CORPORATE RESPONSIBILITY REPORT

# Message from Our Chairman, President and CEO



**Curtis C. Farmer**

Chairman, President and Chief Executive Officer  
Comerica Incorporated and Comerica Bank

We are proud to present to you our 14th annual corporate responsibility report, which includes a summary of Comerica's progress on key environmental, social and governance (ESG) issues, achievements and challenges. Comerica has a long history of proactively addressing ESG matters and we are looking toward the future with a renewed sense of urgency.

At Comerica, we understand our pivotal role in working to address some of society's greatest challenges, such as ending inequalities, addressing climate change and supporting the needs of future generations. As a bank, we hold a unique position in addressing these issues, not only within our own company, but also through the support of our customers and the myriad of communities and industries they represent. Perhaps no year has brought greater focus to our efforts than 2021, with the establishment of our new Office of Corporate Responsibility, led by a member of our Management Executive Committee who reports directly to me. The department will enhance collaboration across the bank, create synergies and fresh ideas, as well as further standardize reporting.

At Comerica, ESG is about identifying key issues where we have the ability to drive positive outcomes and helping customers meet their own ever-evolving needs. We look forward to sharing our detailed results on these drivers behind Comerica's ESG Platform in this report and provide key highlights.

## Financial Education

Comerica is a trusted resource for financial education, and this is reflected in the volunteer work of our colleagues. We hosted 380 business bootcamps across our markets, which are designed to help small business owners and entrepreneurs improve the long-term viability of their companies. In addition, Comerica \$ense financial education programs reached approximately 50,000 individuals from low- to moderate-income communities. The financial commitments made to strengthen local communities in 2021 is matched by the efforts of our colleagues, who continued to devote their time and expertise to support local nonprofits. Their spirit to serve shined bright in 2021, leading to more than 64,800 volunteer hours, translating to over \$1.8 million worth of donated time. To build on this enthusiasm, we announced eight hours per employee of paid time off for community volunteer work in 2022, amplifying our support for their efforts.

## Climate Change

Accountability for addressing climate changes lies first on our ability to reduce our own emissions. Since Comerica set its first greenhouse gas (GHG) reduction goal in 2009, we have worked to make continual progress in reducing our footprint. Over the last decade, we have reduced our Scope 1 and 2 emissions over 57%, exceeding our 50% reduction target for 2025 and well on our way to our 2030 target of 65%. With respect to Scope 3 emissions, we understand our impact extends beyond our own company and worked to enhance our Scope 3 emissions reporting. We continued our membership in the Partnership for Carbon Accounting Financials (PCAF) and expect to report on our Scope 3 Financed Emissions in 2023. In 2021, we also marked the ninth consecutive year we received external assurance of our GHG emissions reporting, highlighting our tenure in high-quality GHG disclosure.

Comerica also participated in the Climate Safe Lending Fellowship program, joining a global cohort of bank sustainability professionals working to identify ways to align financial services with a more sustainable future. In the U.S., Comerica continues to lead the Bank Sustainability Roundtable, a place for bank sustainability practitioners to share best practices and emerging sustainability and climate issues facing our industry and our customers.

## Diversity, Equity and Inclusion

Fostering a diverse workforce and an inclusive culture has remained a catalyst for our success. We understand that diversity as an organization makes us stronger and ultimately allows us to better serve our customers and communities. At year end 2021, 65% of our colleagues and 52% of our managers are women, and 41% of our U.S. colleagues are racial/ethnic minorities. We strengthened our commitment to driving change and being a part of the solution to eliminate racial inequalities through participation in the CEO Action Race & Equity Fellows Program. Additionally, our Diversity, Equity and Inclusion office delivered diversity education to more than 80% of the employee population with a focus on unconscious bias, microaggressions and other anti-racism education. Comerica's leadership team is required to include diversity and inclusion in their annual performance reviews and to include diversity objectives throughout their business lines. Efforts in building stronger relationships among diverse communities included the appointment of National Business Development Managers supporting the African American, Asian American and Middle Eastern American communities. These new roles compliment the work of our Business Resource Groups who continue to attract and strengthen customer relations within our diverse communities.

## ESG-related Products and Services

In 2021, Comerica originated more than \$2.5 billion in community and economic development loans, Comerica's 19 Business Resource Groups closed \$418 million in business supporting specific community groups, and our green lending totaled over \$1.7 billion in loans and commitments at year end. We also expanded partnerships to offer dedicated ESG investment options for our customers to help them invest in line with their values. More recently, Comerica announced the expansion of its Environmental Services Department with the introduction of a new group dedicated to growing and supporting

Comerica's renewable energy business. The Renewable Energy Solutions group will leverage our proven relationship banking model to expand our support of renewable energy industries.

## Access to Capital

We launched gomerica™, a mobile bank which provides a unique way to bring our business directly to local communities and helps fill a void in underserved neighborhoods that often struggle to obtain easy access to banking services. Along with providing banking access, gomerica serves as a critical resource for change in the community, as it hosts financial education sessions and community events to further meet the needs of our customers.

The struggles of keeping the doors open for small business owners since the start of the pandemic has not been lost on us. It challenged us to do more, leading us to commit \$5 billion to small business lending from 2021 to 2023. Additionally, we expanded our RISE! (Resources, Ideas, Support and Engagement) Program to help businesses and communities across our markets thrive amid the pandemic by providing free resources to promote their businesses to current Comerica customers and potential prospects.

Our efforts to remain an ESG leader continue to earn us national and global recognition. In 2021, we were again named to Newsweek's list of America's Most Responsible Companies and were recognized as a Best Employer for Women by Forbes. For the third consecutive year, we secured a place on the global 100 list of most sustainable corporations by Corporate Knights and we were named to the Civic 50 list of the most community-minded companies in the U.S. for the seventh year.

This recognition underscores the critical importance of corporate responsibility to Comerica and our stakeholders, and demonstrates the commitment of all of our colleagues. We look forward to continuing our progress and supporting our customers, communities and planet in these endeavors. It's the right thing to do and makes a powerful and lasting impact.

**Curtis C. Farmer**

Chairman, President and Chief Executive Officer  
Comerica Incorporated and Comerica Bank

# About this Report

**At Comerica, we are dedicated to protecting and preserving the environment; ensuring diversity, equity and inclusion within our company and externally; and serving and strengthening our local communities. Our efforts are shared in this 14th annual Corporate Responsibility Report which details our deep commitment to driving progress in all of these areas. We understand there is always more work to do, and we will continue to move forward in these impactful areas with the goal of ensuring our company, colleagues, customers, communities and other stakeholders continue to thrive, now and long into the future.**

The information and scope of performance data in this report is company-wide for the fiscal year ending December 31, 2021, and all financial information is presented in U.S. dollars, unless otherwise noted.

Our reporting generally aligns with the following standards:



**SASB  
STANDARDS**

**TCFD** | TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES



**SUSTAINABLE DEVELOPMENT GOALS**

This report has not been externally assured. However, we annually assure our Scope 1, 2 and 3 greenhouse gas (GHG) emissions using ISO 14064-3 (limited assurance, **GHG emissions assurance letter for 2021 emissions**). Additional GHG emissions assurance details are provided in our **Most Recent CDP Response**.

Our **Reporting Methodology section** of this report contains additional details regarding the standards we use and our approach to Environmental, Social and Governance (ESG) reporting.

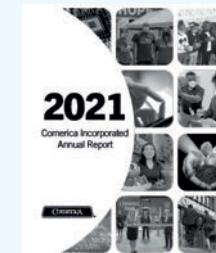
For additional information on ESG activities and disclosures, please see:



**Comerica Corporate Responsibility**



**2022 Proxy Statement**



**Comerica 2021 Annual Report**



**Comerica Investor Relations**



**Most Recent CDP Response**



**Environmental Policy Statement**

In this report and in Comerica's corporate responsibility reports, we use the terms "relevancy," "significance," and "impact" to refer to topics that reflect the environmental, social and governance issues most important to Comerica and our stakeholders; what the Global Reporting Initiative (GRI) Sustainability Reporting Standards define as "Material Topics." 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.

# About Comerica

## Our Company

**Founded in 1849, Comerica (NYSE: CMA) is a financial services company headquartered in Dallas, Texas. While a lot has changed over the past 172 years, one thing has remained the same — our commitment to serving the financial needs of our customers and communities.**

Today, we're one of the largest financial holding companies in the U.S. with 432 banking centers in Arizona, California, Florida, Michigan and Texas and select businesses operating in several other states, including North Carolina, as well as in Canada and Mexico. At Comerica, we focus on relationships and credit our longevity and success to the strong lasting connections we've built with our colleagues, customers, communities and other stakeholders.



### Our Mission

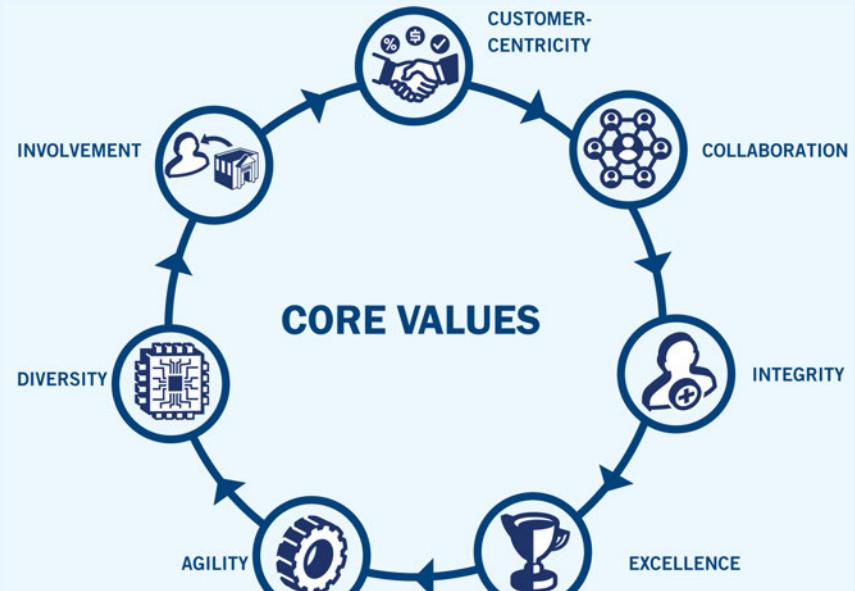
We will achieve balanced growth and profitability by delivering a higher level of banking that nurtures lifelong relationships with unwavering integrity and financial prudence.

### Our Vision

Our vision is to become the highest performing, most respected and most desired bank in the markets we serve.

### Our Core Values

Our values represent how we connect with our customers, stakeholders and each other. People trust us to treat them with respect, to serve them fairly, and to connect them to our services and the opportunities they bring. That's why we exemplify these values in our daily interactions and maintain high standards of ethics and accountability for our Board, leadership and colleagues.



## Our Promise

# We will Raise Your Expectations® of what a bank can be.

This promise guides our interactions with customers and reflects our deep, unwavering commitment to provide them with the service, knowledge and positive experience that meets their desires and exceeds their expectations.

Our strategically aligned business segments are set up to help ensure individuals and businesses are successful:

1



### The Commercial Bank

Provides companies of all sizes with an array of credit and non-credit financial products and services.

2



### The Retail Bank

Delivers personalized financial products and services to consumers.

3



### Wealth Management

Serves the needs of high-net-worth clients and institutions.

## 2021: Business at-a-glance

**172**

years in operation

**432**

U.S. banking centers

**\$94.6**

billion in assets

**\$49.3**

billion in loans

**\$82.3**

billion in deposits

**\$3.0**

billion in revenue

## 2021: Our Team

**7,223**

full-time colleagues

**388**

part-time colleagues

**65%**

of U.S. colleagues are female

**41%**

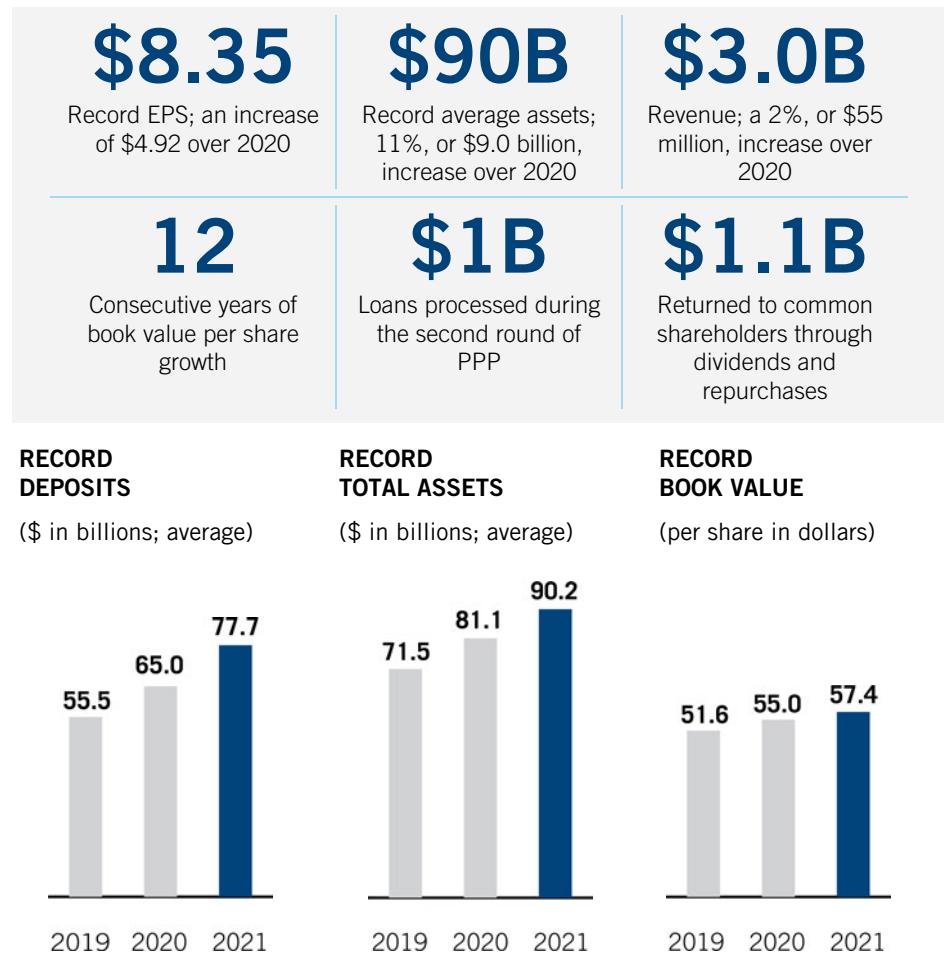
of U.S. colleagues are racial/ethnic minorities

# 2021 ESG Awards and Recognition

Ranked in Global 100 Most Sustainable Corporations in the World by Corporate Knights.	Listed on the Civic 50 by Points of Light, a list of the top 50 most community-minded companies in the U.S. for 7 years	Gold-Level Veteran-Friendly Employer certified in Michigan by Michigan Veteran Affairs Agency for our extensive efforts to recruit, train and retain military veterans
Received 5-star governance rating from Hispanic Association on Corporate Responsibility (HACR)	Brandon Hall Gold Awards for Best Use of Blended Learning and Best Use of Learning and Talent Technologies	Ranked among Newsweek's listing of America's 100 Most Responsible Companies
ATD National Excellence in Practice Award Leadership Category—Comerica Emerging Leaders Program	Achieved perfect Score of 100 for 7th consecutive year on Human Rights Campaign Foundation's Corporate Equality Index	Best in Class for Excellence in Supplier Diversity Award from Great Lakes Women's Business Council
DiversityInc Top 50 Companies Noteworthy List	Named to Black EOE Journal Best of the Best List	13th consecutive year on the FTSE4Good Index
Notable mention on National Diversity Council Index	Named to Forbes Best Employers for Women	Texas Bankers Foundation Leaders in Financial Education (LIFE) Award for Comerica's partnership with the EMPOWER Series, Inc. financial education and self-development coaching and counseling efforts
CDP Supply Chain Engagement Leader for our efforts to evaluate environmental sustainability within our supply chain	Listed in Top 50 Best Companies for Latinas to Work for in the U.S. by the LatinaStyle; the tenth time Comerica has received the honor	

## 2021 Financial Highlights

Our 2021 financial results were strong, with record earnings per share of \$8.35. Average deposits grew 19%, including a 25% increase in noninterest-bearing deposits. This growth supported solid loan performance in several businesses and provided significant excess liquidity to fund future growth. As a result, total average assets increased to \$90 billion, an all-time high, and revenue increased to \$3.0 billion. As a result of solid capital generation, we returned \$1.1 billion to common shareholders through dividends and repurchases of 9.5 million, or 7%, of total shares. With strong market appreciation and our attractive dividend, we generated a total shareholder return for 2021 of 62%, one of the highest among our peers.



For additional information, view our [Comerica 2021 Annual Report](#) and [2022 Proxy Statement](#).

# Corporate Responsibility at Comerica

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# Corporate Responsibility at Comerica

At Comerica, responsibility, honesty and transparency are deeply embedded in our 172-year history and culture. These longstanding ideals, along with our Core Values, are at the heart of our company and inform how we do business on a daily basis. These very same ideals and values guide our Corporate Responsibility or ESG strategy, providing us with a strong foundation for addressing urgent social, economic and environmental challenges, while driving positive change and long-term, sustainable value for our company, stakeholders and communities.

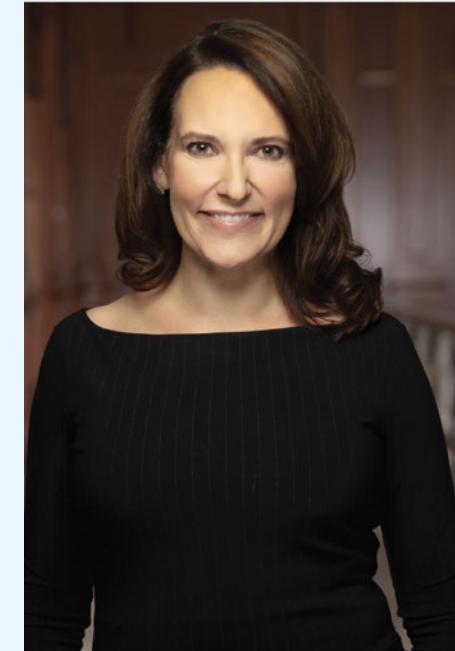
## Our ESG Approach

Comerica has a long history of supporting corporate responsibility and has been publishing an annual report on our ESG progress since being one of the first U.S. regional banks to establish a corporate sustainability office in 2008. Long before that, Comerica helped pioneer issues such as bank environmental risk management and corporate approaches to diversity and inclusion.

In 2021, Comerica brought together a number of ESG-related elements under a unified leadership structure for a new Corporate Responsibility Division. Reporting directly to Comerica's Chairman, President and Chief Executive Officer, the Executive Director of Corporate Responsibility brings together functions including sustainability, community, corporate philanthropy, fair and responsible banking, quality, communications and diverse business resource groups.

First established in 2020, Comerica's ESG Council continues to work toward leadership among our peers and our industry knowing such efforts benefit all Comerica stakeholders. This group drives long-term value by establishing a cohesive, strategic direction to "raise expectations" of Comerica's ESG programs and performance. These ESG results positively impact our customers, colleagues and communities.

"For years, Comerica has been proactive in matters related to our environment, the needs of our communities and customers, and the criticality of a diverse culture. Unifying our experienced and talented team of leaders in this space further enhances our ESG impacts for our customers, colleagues and the communities we serve."



**Wendy Bridges**

Executive Vice President,  
Corporate Responsibility

# Our ESG Platform

Comerica's ESG Platform, established in 2020, highlights the following five key commitments to corporate responsibility:



## FINANCIAL EDUCATION

Invest in financial education for underserved communities



## CLIMATE

Address climate change



## DIVERSITY

Promote a diverse, inclusive and equitable workforce



## PRODUCTS

Enhance ESG-related product and service solutions



## CAPITAL ACCESS

Provide access to capital focused on underserved communities, women, minorities and small businesses

Underpinning these five commitments is our history of strong governance practices, with an emphasis on protecting our reputation and promoting transparency. We measure our progress in all of these areas against the 19 topics listed in the [Impact Matrix](#).

# Impact and Stakeholder Engagement

Since releasing our inaugural sustainability report in 2008, we have continued to refine and refresh our “Impact Topics,” further focusing our ESG efforts on issues that are most important to our company and stakeholders, provide the greatest opportunity for positive impact, and support the Global Reporting Initiative (GRI) approach to ESG reporting.



## Our ESG Assessment Process

In 2019, we completed a refreshed ESG impact assessment. This process took into account the perspectives and expectations of our stakeholder groups, including investors, colleagues, customers, ESG-related non-governmental organizations (NGOs), ESG ratings organizations, media, suppliers, peers and others. Through interviews, surveys, meetings, benchmarking and research, we identified the topics of greatest importance to our business and stakeholders.

With input from select Comerica business unit and executive leaders, select external sustainability subject matter experts, and use of Datamaran's materiality software platform, we then updated our Impact Matrix to support topic prioritization and guide our ESG reporting.

While we consistently monitor and evaluate global ESG issues, business needs and stakeholder expectations, these Impact Topics and priorities have remained relevant to our business and our stakeholders throughout 2021. They also form the foundation for our ESG Platform.

### Datamaran: An Evidence-Based Approach to ESG

We augment our traditional stakeholder feedback process with the Datamaran software platform to ensure that we are considering all potential ESG information relevant to our business. Through the use of artificial intelligence and natural language processing, combined with advanced data analytics, the software allows for more dynamic monitoring of the evolving ESG landscape.

“By using this data-driven approach to our impact analysis, we have been able to incorporate a wider range of data and stakeholders than was previously possible. In combination with human validation, this enables us to gain a more robust, evidence-based perspective into ESG-related topics.”

**Scott Beckerman**

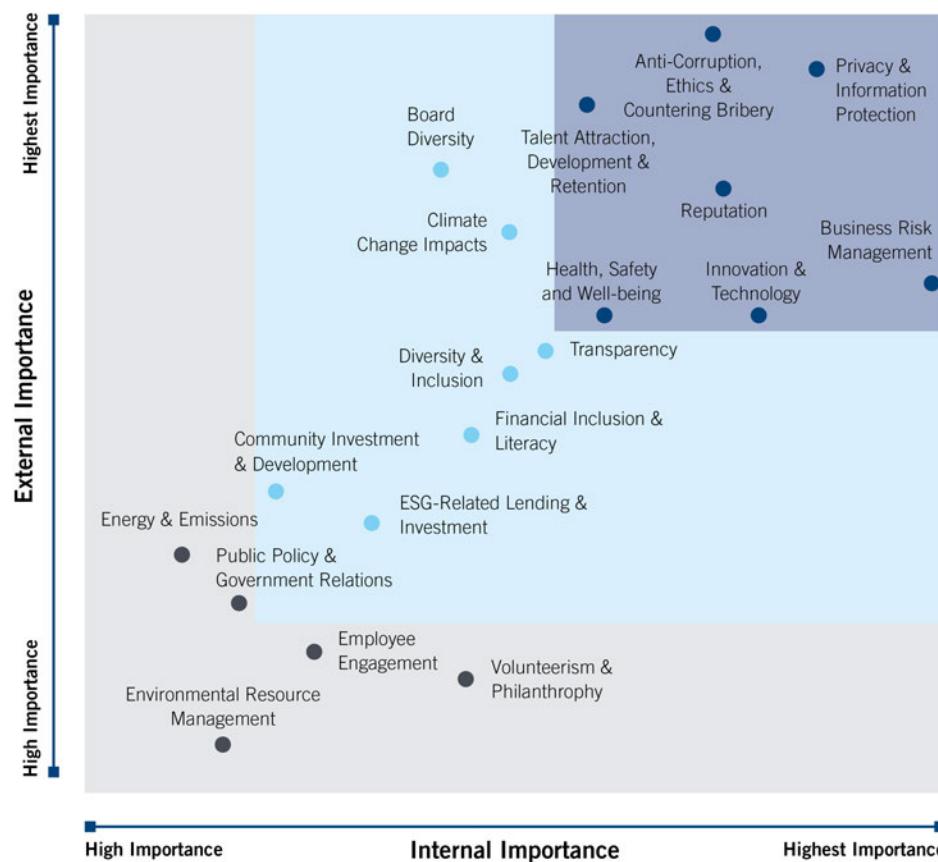
Senior Vice President, Director of Corporate Sustainability

## Stakeholder Engagement

We regularly engage with a broad cross-section of diverse stakeholders on ESG issues to inform our strategy. Through meetings, surveys, conferences, online communities, events, updates and other outreach activities, we help ensure prioritization of the key ESG topics most important to our stakeholders.

Stakeholder Group	Methods of Engagement	Priority Topics
<b>Colleagues</b>	Intranet communications, Sustainability Council, green office teams, individual meetings	Strategy, communications, performance vs. goals, innovation, serving customer needs
<b>Customers</b>	Individual meetings, surveys, online communities, customer appreciation events	Financial education and knowledge sharing on broad variety of topics, partnering with community organizations, cybersecurity
<b>ESG-related Non-Governmental Organizations (NGOs)</b>	Individual meetings, surveys, professional organizations	Improved banking access, financial education, customer engagement strategies on ESG issues, transparency in policies and communications
<b>ESG Rating and Ranking Organizations</b>	Individual meetings, surveys, professional organizations	Engaging the value chain, moving from disclosure to action, focus on diversity, climate change, stranded assets, impact investing, responsible lending, investor communication on ESG, board diversity
<b>Impact Investors</b>	Individual meetings, investor conferences/presentations, quarterly earnings calls	Transparency, stranded assets, climate change issues
<b>Industry</b>	Industry organizations, professional organizations	Green lending, aligning financial services to client aspirations, natural capital, supply chain
<b>Investors and Analysts</b>	Individual meetings, regular updates, investor conferences/presentations, quarterly earnings calls	Financial performance, long-term strategies, transparency, cybersecurity, compensation practices
<b>Media</b>	Individual meetings, news releases	Supply chain, financial performance, climate change, ESG goals
<b>Peers</b>	Industry organizations, professional organizations, individual meetings	Demand for ESG transparency, common approaches to industry ESG issues, impact of regulations, innovation, supply chain
<b>Suppliers</b>	Regular reviews, surveys, individual meetings	Technology and innovation, common ground on sustainability, cost/beyond basic metrics, partnerships, efficiency

## IMPACT MATRIX



Our ESG Impact Matrix follows the design of a GRI Standards-based sustainability materiality assessment. As detailed in our [ESG Impact Assessment Report](#), we use this approach to identify the most impactful ESG topics and their associated relative significance to Comerica and our stakeholders in a visual format.

Comerica deliberately refers to these topics as “Impact Topics” and our “Impact Matrix.” We do this to avoid any potential confusion with the term materiality under securities law.

## Updating Impact Topics

At Comerica, we view our ESG initiatives as a journey, and we focus on continuous improvement. We also recognize that stakeholder views and priorities, as well as global challenges can change over time. We periodically review and update our impact assessment to help ensure our ESG strategy and efforts remain current.

While colleague health, safety and well-being was not listed as an Impact Topic when our ESG Impact Assessment Report was last updated, the ongoing COVID-19 pandemic has certainly elevated its importance. From the onset of the pandemic in 2020, our guiding principle has been consistent: our priority is the ongoing health and safety of colleagues, customers and vendors, while still providing the critical services that are needed to meet our customers’ financial needs.

We also elevated the prominence of Board Diversity and Climate Change Impacts based on the increase in internal prioritization of these topics, relative to what we have previously published in our most recent [ESG Impact Assessment Report](#). This report contains additional details on our impact assessment and stakeholder engagement process. We plan to provide an update to our ESG Impact Assessment in 2022/2023.



# ESG Platform Alignment

In addition to aligning our ESG reporting with the GRI Standards, Comerica recognizes the significance of the United Nations' Sustainable Development Goals (SDGs) and the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standards for the Financial Sector as guidelines and targets we can use when determining the areas in which we can make the most impactful contributions toward global sustainability efforts. The table below illustrates how our Impact Topics and ESG Platform (organized by report chapter) align with both SDGs and SASB topics.

While there may be other SASB financial services standards that contain information relevant to a portion of our operations, Comerica has determined that SASB's Commercial Banks standard is most applicable for our core business. Additionally, SASB standards use the Sustainable Industry Classification System® to group companies based on shared sustainability risks and opportunities, and the SICS® Look-up Tool identified Comerica as classified in the Financials industry and Commercial Banks sector. See our [SASB Content Index](#) for more information.

ESG PLATFORM ALIGNMENT	REPORT CHAPTER	SDG ALIGNMENT	SASB TOPIC ALIGNMENT
i. Provide access to capital focused on underserved communities, women, minorities and small businesses	Customers		Financial Inclusion and Capacity Building Incorporation of ESG Factors in Credit Analysis
			Financial Inclusion and Capacity Building Incorporation of ESG Factors in Credit Analysis
	Community		Financial Inclusion and Capacity Building Incorporation of ESG Factors in Credit Analysis
			Financial Inclusion and Capacity Building
ii. Promote a diverse, inclusive and equitable workforce	Colleagues		Financial Inclusion and Capacity Building
			Financial Inclusion and Capacity Building
iii. Invest in financial education for underserved communities	Community		Financial Inclusion and Capacity Building

ESG PLATFORM ALIGNMENT	REPORT CHAPTER	SDG ALIGNMENT	SASB TOPIC ALIGNMENT
iv. Address climate change	Environment		Incorporation of ESG Factors in Credit Analysis
v. Enhance ESG-related product and service solutions	Customers		Financial Inclusion and Capacity Building Incorporation of ESG Factors in Credit Analysis
	Environment		Financial Inclusion and Capacity Building Incorporation of ESG Factors in Credit Analysis
	Responsible Business		Business Ethics Systemic Risk Management

# Oversight of ESG

**Comerica's commitment to the long-term value embedded in our ESG Platform starts at the top. Our Comerica Incorporated Board of Directors and executive leadership share responsibility for identifying and overseeing the ESG areas where we can make the biggest positive impact as a company.**

## Board of Directors

Our Board currently consists of 10 independent directors plus our Chairman who oversee and guide our corporate responsibility and ESG-related commitments, policies and programs. They have each reviewed and committed to abide by our Code of Business Conduct and Ethics for Members of the Board of Directors, which is a code specific to their positions of responsibility and influence within our company.

## Board Committees

- The Board's Enterprise Risk Committee (ERC) oversees all of Comerica's risk management, including environmental and social risks (e.g., sustainability, climate change and corporate social responsibility). ERC oversight includes evaluating areas of progress, challenges and future initiatives and annual reviews and approval of the sustainability action plan created by the Comerica Sustainability Council. The ERC receives regular updates from Comerica ESG leaders and is responsible for sharing ESG-related matters and stakeholder engagement results with the rest of the Board. In 2021, the Director of Corporate Sustainability provided regular updates on climate-related issues to the ERC.
- The Board's Governance, Compensation and Nominating Committee is responsible for determining the constituency of the Board and looks at diversity of experience, professions, skills, geographic representation and/or backgrounds when evaluating nominees. It also reviews Comerica's human capital management strategy, talent development program and colleague diversity, equity and inclusion initiatives.

## ESG GOVERNANCE FRAMEWORK

COMERICA INCORPORATED BOARD OF DIRECTORS					
Audit Committee	Enterprise Risk Committee	Governance, Compensation and Nominating Committee			
MANAGEMENT EXECUTIVE COMMITTEE					
ESG Council	Executive Diversity Committee	Enterprise Risk and Return Committee			
ESG COUNCIL					
Sustainability Council	Sustainability Finance Council				
CROSS-FUNCTIONAL ESG SUPPORT TEAMS/GROUPS					
Green Office Teams	Business Resources Groups	Employee Resource Groups/Diversity, Equity and Inclusion Education Council			
Climate Stress Testing Group	Climate Risk Inventory Group	Corporate Responsibility Report Group			
FUNCTIONS THAT ENABLE ESG					
Risk	Audit	Investor Relations	Procurement	Technology	Legal
Government Relations	Finance and Accounting	HR and DEI	Marketing, Data and CX	Contributions	Communications
Credit	Wealth Management	Retail Bank	Commercial Bank	External Affairs and Volunteerism	Real Estate

## Executive Level

### Office of Corporate Responsibility

In 2021, Comerica established an Office of Corporate Responsibility to serve as a focal point for all of the collaborative ESG efforts across the bank. The Office and its colleagues serve as a corporate catalyst to enhance synergies, develop fresh ideas, standardize reporting, monitor the ESG landscape for best practices, and take note of the resulting benefits to colleagues, customers, communities, and the planet. The office also works to identify emerging ESG issues and brings them to the attention of appropriate business unit(s) and Comerica leadership. An Executive Vice President, Corporate Responsibility was appointed to oversee the Corporate Responsibility Office in November 2021. She reports directly to the Chairman, President and CEO, serves on Comerica's Management Executive Committee and leads Comerica's ESG Council.

### FUNCTIONS WITH COMERICA'S CORPORATE RESPONSIBILITY DIVISION

Corporate Responsibility Office		
Overseen by the Executive Director of Corporate Responsibility		
Sustainability	Community/External Affairs	Fair and Responsible Banking
Corporate Quality	Social Impact and Volunteerism	Media Relations and Corporate Communications
Community Reinvestment Act (CRA)	Corporate Philanthropy	Diversity, Equity and Inclusion <sup>1</sup>

### ESG Council

The ESG Council, launched in 2020, drives long-term value by engaging senior leadership from across the bank in identifying the most significant ESG issues for the company; determining strategies, priorities and goals; creating policies and programs to address these issues; and monitoring progress. The ESG Council is chaired by the Executive Director of Corporate Responsibility, and the council reports ESG progress to the Chairman, President and CEO and the Management Executive Committee on a biannual basis. In addition to the Chair, members of the ESG Council include representatives from all three Comerica business lines, the Chief Community Officer, Chief Diversity Officer, Director of Corporate Sustainability, Director of Investor Relations, Director of Enterprise Risk and Credit Review, Portfolio Risk Analytics, Director of Government Relations and other select representatives.

In conjunction with the August 2021 release of Comerica's 13th Corporate Responsibility Report, the ESG Council identified five key ESG priorities as [Comerica's ESG Platform](#).

### Comerica Sustainability Council

The Comerica Sustainability Council is chaired by the Director of Corporate Sustainability with executive sponsorship from the Management Executive Committee and support of senior managers from across the organization. Annually, the Council prepares a sustainability action plan for review and approval by the Board's ERC. This group is responsible for implementation of the sustainability action plan across the company.

### Enterprise Risk and Return Committee

The Enterprise Risk and Return Committee (ERRC) is responsible for the coordination and oversight of all risk-related activities across the company, including climate-related risks. The ERRC is chaired by the Chief Risk Officer and authorized by the Board's ERC to perform duties and initiate activities on its behalf. In 2021, it received updates from the Director of Sustainability and provided quarterly reports to the Board's ERC on its assessment and management of climate-related risks and opportunities.

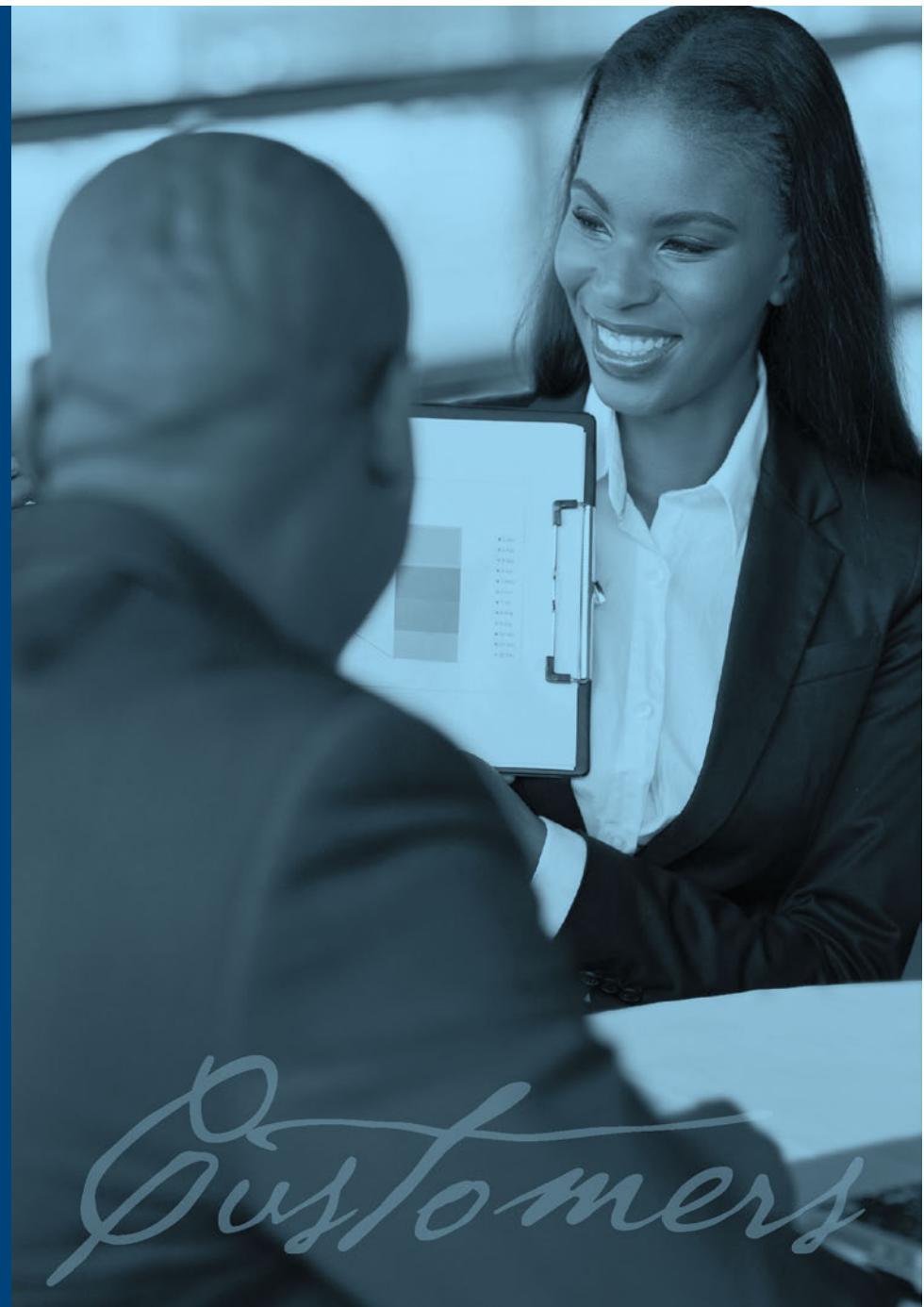
<sup>1</sup> DEI issues are primarily managed by our Chief Diversity Officer within our Human Resources division but supported externally by our External Affairs team.

# Customers

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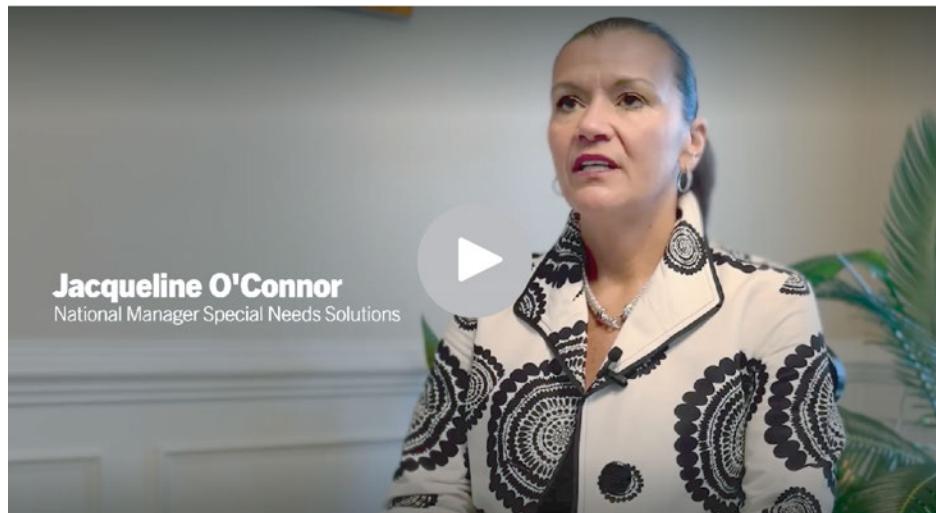
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# Customers

**Our customers are at the center of all we do. We work to safeguard their information and protect them from fraud. By working to regularly gather and incorporate customer feedback, our relationship-focused approach supports their connections to the right products and services while strengthening our abilities to meet their needs through secure, innovative technology. Comerica also supports the development of our customers' financial literacy to successfully manage their ever-evolving financial needs.**

## CUSTOMERS VIDEO: SPECIAL SOLUTIONS



[CLICK HERE TO WATCH VIDEO](#)

## Comerica Promise

At Comerica, we strive to deliver experiences that exceed our customers' expectations and proactively understand their needs. The Comerica Promise guides our interactions as we strive to provide the knowledge and expertise to meet the needs of both current and potential customers.

## Responsible Marketing and Sales

Acquiring and maintaining life-long relationships with customers requires presenting our products to them in an honest way. We review our marketing communications before release to ensure compliance with relevant laws, rules and regulations, including the Equal Credit Opportunity Act; the Truth in Lending Act; the Truth in Savings Act; and Unfair, Deceptive and Abusive Acts and Practices, among others. The Financial Industry Regulatory

Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC) regulate certain types of marketing materials and we carefully review such material through our legal, risk and compliance processes.

We follow the applicable regulatory requirements for customer contacts and interactions, and maintain internal policies and procedures to ensure proper disclosure of interest rates and other important terms and conditions. We also require that relevant colleagues complete annual, comprehensive fair lending and anti-discrimination training. In 2021, 99.9% of applicable colleagues completed this training.

We listen to our customers and take the time to understand their individual business and personal needs. Our Corporate Quality Process Department reviews customer concerns and complaints to identify and track potential issues using our complaint management system. We analyze data for any potential trends across business units and customers to identify issues that might have company-wide impacts. This allows us to proactively address areas of concern and continually improve our customer services. Complaint data is regularly provided to Comerica's senior management and the Board's Enterprise Risk Committee.

**"How we take care of our customers directly impacts how Comerica is received in our communities. Delivering strong customer service is one of the many ways we act as trusted advisors and help raise expectations."**

**Alicia Stephens**

Senior Vice President, Director of Corporate Quality

## Managing Customer Feedback

Our customers' expectations challenge us to meet their financial services requirements while simultaneously satisfying their desires for technology, innovation, efficiency and convenience. To better meet their needs and desires, we gather customer feedback on current and new products through focus groups, surveys, our online customer community, quantitative research, social media platforms and our banking and call centers. Customer survey data provides us insight into overall trends and helps guide our improvement efforts. We also conduct customer satisfaction surveys at individual banking centers to provide managers with actionable feedback to improve performance.

As part of technology investments made within the Customer Contact Center, customers are offered a survey at the conclusion of every call to assess the effectiveness of our services and provide any other feedback. Whenever servicing a need, issue or complaint raised by a client, colleagues work to address the need or resolve the issue at the first point of contact. If further assistance is needed to resolve a customer's concern, it is escalated to a manager. Following that, it is elevated to Comerica's Quality Department.

## Consumer and Fraud Protection

Our customer relationships are built on trust, including trust in us to safeguard privacy and financial information. Our engagements with external stakeholders reveal that customer privacy and protection — defined as securing customer data, confidentiality and physical safety — is one of their most important priorities, and cybersecurity was identified as a topic critical to our business success. To learn more, see the **Privacy and Information Security subsection** in this report.

While we work diligently to protect our customers' information and privacy, we also provide resources to assist our customers in better protecting themselves. Comerica.com includes a **Fraud Center** tab with links to summaries of common fraud scams, special alerts to advise customers of known fraud activity and methods for reporting suspected fraud.

## Small Business Support

We are committed to helping small businesses grow and prosper. Comerica banking centers and business banking teams are located in areas where small business customers are concentrated, serving those customers with under \$30 million in annual revenues with our relationship-based approach. At Comerica, relationship-based banking involves a long-term value-creation approach that leverages our long-tenured, experienced team to facilitate impacts that extend well beyond our company. We seek to engage with our customers and respond to their needs in not only economic terms, but in ways that address ESG issues as well.

### Loans

Small business owners who have struggled to keep the doors open since the start of the pandemic have not been lost on us. Their struggle has challenged us to do more. We recently committed \$5 billion to small business lending from 2021 to 2023. For the year 2021, we had more than \$1 billion in new small business loan commitments. Our Small Business Administration (SBA) lending, including government-guaranteed 7a and 504 loans, totaled \$204 million in 2021.

### Paycheck Protection Program Support of Small Businesses

Our response to pandemic impacts to small businesses also includes continued involvement in the Paycheck Protection Program (PPP). In 2021, colleagues worked tirelessly to ensure small businesses received this funding, helping more than 6,000 customers process more than \$1 billion in loans during the second round of PPP, with 83% of our processed PPP loans having gone to businesses with fewer than 50 colleagues. As of 2021 year-end, 91% of PPP loans had been repaid, mostly through the forgiveness process.

In addition to direct loans to small businesses, Comerica provides loan capital to microenterprise loan funds where we operate. In 2021, we funded 35 microenterprise loan funds to support small businesses.



### Other Resources and Programs - RISE!

In 2021, we expanded our RISE! (Resources, Ideas, Support and Engagement) Program to continue helping businesses and communities in our Michigan market thrive amid the pandemic. We provided resources for businesses to promote themselves to other current Comerica customers and potential prospects through free digital advertising, free live-read radio spots, free email blasts to our customer base and placement on the Comerica Business Customer Directory.

Ad spots provided to small businesses on Detroit Tigers and Detroit Red Wings radio broadcasts through the RISE! program accumulated significant media exposure value for those small businesses. Since 2020, the program has provided nearly \$1 million in media value and production costs to small businesses. Additionally, two benefit partnerships provided our small business customers with exclusive office and computer equipment discounts and savings through Office Depot and Software House International.

Comerica colleagues continued to provide their time and expertise to small businesses through partnerships with local community-based organizations and nonprofits, including through Comerica's Business \$ense Boot Camp. In 2021, we conducted 380 small business bootcamps through which more than 17,000 small business attendees received technical assistance and other consulting services.

Our Comerica Financial Education Brigade (CFEB) is a collection of colleague volunteers dedicated to improving communities through financial empowerment. CFEB members are trained to teach financial education and also provide assistance to small businesses through SCORE, Pacific Community Ventures, Revive Dallas Small Business Relief Fund – Fast Start Mentoring Program, Young Entrepreneurz Solutions and Network for Teaching Entrepreneurship.

Programs, such as Comerica Works, Money \$ense and the Comerica Small Business Resource Center, similarly provide financial and business skills training to enhance technical knowledge and support entrepreneurship. Recognizing the value and importance of small businesses to our local markets, Comerica created the first Comerica Small Business Resource Center in Riviera Beach in 2018. We sponsored the program and partnered with community organizations to help deliver specialized training to small businesses and entrepreneurs in this south Florida community.

### Comerica Small Business Resource Centers

Business owners, the majority of whom represent diverse populations, are provided key training on topics such as:

- Start-smart business planning
- Legal, accounting and insurance issues
- Branding and social media
- Contracting
- Marketing and the perfect pitch



# Innovation and Technology

**Our mission is to incubate and leverage technology to advance the banking capabilities for colleagues and customers. This allows us to deliver a better banking experience through a culture of innovation. By giving life to ideas, we meet the evolving needs and desires of our customers and strengthen our relationship-based approach to banking.**

Our teams use a streamlined innovation process to ideate, test, pilot and rollout technology solutions for our colleagues and customers. Looking to the future, our ambition is to institutionalize our innovation processes, execute with agility, empower future-ready talent, scale design thinking and celebrate successes.

Our customers continue to increase their use of the digital and technological opportunities that we provide.

## Increases in Digital Technology Use (2021 vs. 2020)

**64%**

in average volume of real-time payments

**47%**

in Zelle transactions

**21%**

in monthly checking statements sent electronically

**13%**

in click-and-capture mobile deposits

**11%**

in average monthly volume of wire transfers

**7%**

in number of mobile banking users

Cybersecurity is also an essential component of our technology strategy and is focused on prevention and protecting us from cybersecurity issues that threaten customer privacy and/or security as described in the **Privacy and Information Security subsection** of this report.



# Financial Inclusion

**Our ESG Platform includes a commitment to providing access to capital to underserved communities, women, minorities and small businesses because we understand that Comerica thrives when our customers are successful and our communities prosper.** We work hard to expand financial inclusion, including improving the accessibility of our banking centers; providing appropriate products to help meet the needs of the underbanked; providing remote banking channels, such as web and mobile banking; and supporting relevant partners in low- and moderate-income (LMI) communities through funding and service.

**Here are some of the ways we are living our commitment:**

1

To improve the accessibility of our banking centers, we relocate or consolidate banking centers to more convenient and visible locations, refurbish older banking centers to improve environmental performance and invest in broadening our digital offerings with the goal of enhancing and expanding the customer experience.

2

To meet the needs of the underbanked, we have tailored products, such as the Comerica Secured Credit Card, which is an entry-level, cash-secured credit card that helps those who do not qualify for a traditional credit card build credit history. In addition to helping expand our customers' access to credit, we offer the Access Checking account with a flat monthly fee or no fee with direct deposit. We also offer a Statement Savings account, which has no monthly maintenance fee if the customer maintains any Comerica personal checking account and encourages good saving habits.

3

Comerica Bank is the exclusive issuer of the U.S. Treasury's Direct Express® Debit MasterCard® Program to deliver government benefits electronically to 3.6 million active federal benefit recipients monthly. This prepaid card program delivers benefits cost-effectively and securely and is an on-ramp to financial inclusion for millions of unbanked Americans.

4

In September 2021 we launched gomerica, a mobile banking service bus, in Naples, Florida. Partnering with the local Boys & Girls Club, who let us launch the service at its county headquarters, we are providing a unique way to bring our business directly to local communities and helping fill a void in underserved neighborhoods that often struggle to obtain easy access to banking services. Along with providing banking access, Comerica plans to host financial education sessions and other community and customer events using the gomerica bus, as well as provide continuous assistance to customers and communities with their banking needs during natural disasters or temporary closures.

## Business Resource Groups

Our Business Resource Groups (BRGs) operate across our primary markets to pursue strategies that meet the banking needs of our diverse communities. Each team has an outreach budget to support business development and community outreach with relevant associations and nonprofit partners serving underserved communities to increase financial inclusion. Comerica's BRG teams contributed to more than \$418 million in BRG-related closed business in 2021.



**"The launch of gomerica in Naples is a true change agent for our bank, making financial tools and resources more readily accessible and convenient to a larger demographic – the fully banked, underbanked and unbanked. We intentionally launched our mobile bank with one of our community partners that serves primarily low-to moderate-income families to ensure we would have maximum impact in the Naples market."**

**Irvin Ashford, Jr.**

Senior Vice President, Chief Community Officer

## Financial Education Brigade

Comerica's Financial Education Brigade (CFEB), which is discussed in more detail in the [Community section](#), also helps to promote financial inclusion through education. The CFEB provides assistance with home ownership through our partnership with the Dallas Area Habitat for Humanity. CFEB members offer financial education to many individuals looking to own homes in LMI communities. The CFEB also promotes financial inclusion for women and girls in need through a partnership with 50/50 Leadership. Additionally, in 2021, approximately 50,000 individuals from LMI communities were reached by Comerica \$ense financial education programs.

For further information on how our financial education efforts support financial inclusion, see the [Financial Education subsection](#) in our Community section of the report.

## Targeted Programs for Military and Veterans

Comerica's Military & Veterans Business Resource Group in Michigan strives to build strong community and business relationships in support of current and former military service members in the communities we serve.

Our Michigan Military and Veterans BRG focuses on honoring those men and women who have paid the ultimate sacrifice through various service activities including Wreaths Across America, whose mission is to Remember, Honor and Teach by coordinating wreath-laying ceremonies at veterans cemeteries. This BRG is also focused on supporting veterans in need by organizing food and supply drives for local Veterans Affairs hospitals and providing avenues for military members, veterans and their families to thrive in their post-service lives by partnering with local nonprofit organizations with a military focus.

## ADA Accessibility and Spanish-language Options

To best serve our Spanish speaking customers, we offer Spanish language options at our ATMs, on Comerica.com and in the Customer Contact Center. Both English- and Spanish-speaking agents are available in our Customer Contact Centers, and we offer translator services to assist customers in other languages, as needed. In addition, Comerica abides by the Americans with Disabilities Act (ADA) and provides services for visual and/or hearing-impaired customers.

### Well Recognized - Leadership in Financial Education (LiFE) Award

In 2021, we were recognized by the Texas Bankers Association with a LiFE Award for our Business \$ense Bootcamp program. During the COVID-19 pandemic, it was clear early on that minority- and women-owned small businesses and entrepreneurs, as well as underserved communities, were disproportionately affected. In response, we launched a virtual format of our in-person Bootcamp program in collaboration with various community partners. The Comerica Business \$ense Bootcamp offers free or low-priced financial literacy workshops that are designated to provide financial education resources and technical assistance to small businesses and entrepreneurs while helping them scale and sustain during the pandemic. Topics include marketing/branding, legal matters and bank relations/funding.



# ESG-related Lending and Investment

**Our ESG Platform includes a commitment to enhancing ESG-related products and service solutions.** At Comerica, this translates into lending to environmentally beneficial companies, as well as our commitments to financial inclusion, financial education, and community investment and development.

We recognize our sustainability influence goes well beyond our own footprint. By working with companies involved in environmentally beneficial industries and projects, we in turn advance issues like recycling, sustainable energy, green buildings and pollution reduction.

Since 2012, Comerica has tracked environmentally beneficial or “green” loans within our loan systems using our 14 green loan categories.

**\$1.7 Billion**

in loans and commitments coded to environmentally beneficial (green) businesses or projects

**42% Increase**

in loans and commitments coded as green in 2021 (vs. 2020)



## 14 Green Loan Categories



GREEN BUILDING  
(NEW OR RETROFIT)



BIO-FUELS



RECYCLING



BIO-GAS



ENERGY EFFICIENCY



VEHICLE  
ELECTRIFICATION/ADV  
BATTERY/FUEL CELL



BROWNFIELD  
REDEVELOPMENT



SMART GRID  
TECHNOLOGIES



WIND ENERGY



POLLUTION CONTROL



SOLAR ENERGY



GREEN ENGINEERING/  
CONSULTING/  
EVALUATION/DESIGN  
SERVICES



GEOTHERMAL, WAVE  
OR TIDAL ENERGY



OTHER GREEN  
PRODUCTS AND  
SERVICES

We provide resources and guidance to help colleagues accurately code environmentally beneficial loans in Comerica's systems through an on-demand, narrated training on our Comerica Sustainability intranet site. To be counted as a green loan, these loans must be to either inherently green companies or companies that use a majority of loan proceeds for green purposes.

## Determining Green Loans

### Inherently Green Company

More than **50%** of revenues attributed to green products or services

### Use of Proceeds for Green Purposes

More than **50%** of loan proceeds dedicated to green purposes

Loans to recycling, bio-gas, brownfield redevelopment and green building categories accounted for 72% of the loans and commitments we made to environmentally beneficial businesses and projects at year-end 2021.

Comerica continued its relationship with the global Partnership for Carbon Accounting Financials (PCAF), using its transparent and harmonized assessment standards to evaluate the climate impacts associated with our loans and investments. For more information on our PCAF commitment, review *An Industry-wide Effort: Partnership for Carbon Accounting Financials* in the **Environment section** of this report.

In addition, Comerica supports the purchase of green bonds as part of the overall capital we hold. In 2021, Comerica purchased over \$130 million in green bonds and will significantly exceed that amount in 2022, having more than doubled our 2021 purchases midway through 2022.

### Customers Investing Their Values

With sustainable investing experiencing rapid growth, there is growing recognition that those companies that manage sustainability issues well may be better positioned for the long term. In 2021, Comerica partnered with notable ESG leader BlackRock to offer our customers dedicated ESG investment options. These options and their underlying ESG-focused analysis will help increasing shed light on emerging risks and opportunities while allowing our customers to invest in line with their values.

### Community and Social-Related Business Activities

For further information on how our community investment and development efforts support ESG-related lending and investment, see the information in the **Community Investment and Development section**. Additionally, see how we further support the banking needs of our diverse communities with our **Business Resource Groups**.



# Colleagues

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# Colleagues

Our goal of exceeding customer expectations starts with one of our greatest strengths—our more than 7,000 diverse and talented colleagues. We want to make sure Comerica is a great place to work and focus our efforts on attracting, engaging and retaining top talent by fostering a diverse, equitable, respectful and inclusive workplace and culture and by communicating regularly, openly and honestly. We also invest in our people—empowering them through opportunities to adapt, develop, thrive and innovate.

**Our Colleague Promise** describes the behaviors and values that define our culture and align with our code of conduct.

As Comerica colleagues, we are united by a strong desire to help our customers and communities prosper. But we're also bound by something far more powerful: a passionate and unwavering commitment to each other.

Our core values define who we are and form the foundation of a unique, inclusive and collaborative culture that sets us apart from other institutions, ensuring that the choices we make and the actions we take are always in the best interests of our customers.

In this way, every day, we are raising the expectations of what a bank can be.

## 2021 Workforce at-a-glance: Our Team

**7,223**

Comerica full-time colleagues

**388**

Comerica part-time colleagues

**65%**

of Comerica's U.S. employees are female

**41%**

of Comerica's U.S. colleagues are racial/ethnic minorities



For more metrics on our workforce, view our [Colleagues Key Metrics Table](#) and our [Diversity, Equity and Inclusion Key Metrics Table](#).

# Talent Attraction, Development and Retention

We use a variety of creative recruitment strategies to attract top talent. Our wages and benefits are competitive, and we invest in innovative tools and programs to identify diverse, qualified candidates with appropriate skill sets and values. Diversity, equity and inclusion (DEI) is key to our attraction, recruitment and promotion efforts, and we have built-in steps to ensure diversity in our talent pipeline. For more information on our DEI efforts, visit the [DEI section](#) of this report.

To engage and retain talent, we provide various learning opportunities for colleagues, such as technical and interpersonal skill training, compliance training, and management and leadership training. We also provide several development opportunities, including coaching and mentoring. Our goal is to foster a positive talent journey, where colleagues continue learning and developing with us as they contribute to the growth and success of our company. That's why we work with our colleagues to identify and develop capabilities to support our business strategy, and support managers and colleagues with the resources needed for their career growth.

## Attracting New Colleagues

We measure our talent acquisition strategy success on speed and quality of acquisition, diversity of the applicant pool and new colleague retention. In addition, overall performance metrics are tracked for each key business line. We regularly evaluate and modify our sourcing strategies and support structures to ensure we consistently meet performance targets. Refer to the [DEI section](#) of this report for more details on how we focus on attracting diverse talent.

### 2021 Achievements: A Great Return on Colleague Investment

**12** YEARS

average tenure

**46%**

of the approximately 2,200 open colleague positions filled by internal hires

**80%**

approximate colleague participation in our second enterprise-wide employee engagement survey

# Learning and Development

We believe a great place to work is one where our colleagues have the tools and resources to strengthen their skills and drive their career growth. We provide this opportunity through Comerica University, a learning resource comprised of various training topics, including sales, product, operations, technology, underwriting, management, leadership and more. To help ensure accessibility and to meet our colleagues where they are, training is delivered through various formats, including self-paced, online, classroom, book, video, mobile and podcasts. Comerica University is also the home of premier programs such as Comerica's Leadership Development Program, the Emerging Leaders Program and our Management Essentials Certificate series. Additionally, we offer colleagues the opportunity to participate in the Master of Sustainability Awareness (MSA) program.

### 2021 Learning and Development Awards and Recognitions:

- Association for Talent Development National Award of Excellence in Leadership Development
- Association for Talent Development Axis Award in Organizational Change Management
- Brandon Hall Gold Award, Best Use of Blended Learning
- Brandon Hall Gold Award, Best Use of Learning and Talent Technologies
- Brandon Hall Silver Award, Best Advance in Learning Strategies

## 2021 Year of Development – Driving Your Development

Comerica designated 2021 as the "Year of Development," an initiative focused on colleague development in response to our employee engagement survey. Throughout the year, colleagues received monthly communications with a variety of activities, including courses, books, videos and more to enhance their professional development and skills. The program was voluntary and available to all colleagues. The efforts resulted in a 21% increase in learning hours consumed per colleague and a 4% increase in colleague engagement training favorability scores. We have designated 2022 as "Year of the Manager," focusing on providing managers with tools and resources to improve their managerial skills.



### 2021 Highlights

**7,600+**

skills-based training opportunities offered to Comerica colleagues, up from approximately 7,000 in 2020

**87%**

of colleagues took advantage of voluntary skills training

**28.2**

hours of training per colleague, up from 23.2 hours in 2020

**13,000**

completions of product training programs

**4.3-4.8**

out of 5 average ratings for product training programs

**9,000+**

product practice scenarios completed by sales colleagues, earning an aggregate 95% score

We also encourage colleagues to participate in external development programs and volunteerism. Beginning in 2022, all full-time colleagues were granted up to 8 hours of paid time off (PTO) and all part-time colleagues granted up to 4 hours of PTO annually to use for volunteer events. For additional information on volunteer efforts in our local communities, see the [Community section](#) of this report.

### Tackling Turnover

In 2021, according to the Society of Human Resource Management (SHRM), an average of more than 3.98 million workers quit their jobs each month, with the last 10 months of the year seeing the largest exodus of colleagues on record. Against this backdrop of “the great resignation,” we experienced a colleague turnover rate of 19%, 7.4% higher over 2020. While we attribute much of this increase to the ongoing global pandemic and a strong job market, we know we can do better.

We regularly track our turnover rate by gender, age, type and market. The results, in combination with our engagement and DEI metrics, help inform our retention, development and engagement programs. The [Colleagues Key Metrics Table](#) shares our turnover data.

To combat employee turnover, we focused on additional colleague support and benefits in 2021, including providing cultural holiday pay, flexible work arrangements through our WorkBest program, additional investments in training and development, remaining competitive with salary by raising the minimum wage to \$18 per hour, recognizing colleagues who embody our core values and the Comerica Promise through our Promise Champion awards and expanding benefits to support families with paid parental leave and an adoption subsidy.

For more information on Comerica’s efforts on recruitment, retention and development of diverse colleagues, see the [DEI section](#) in this report.

# Employee Engagement

In 2021, Comerica conducted its second enterprise-wide employee engagement survey, with approximately 80% of colleagues participating. These results are indicative of our culture, where open communication is cultivated and colleagues are seen, heard, informed and empowered. To ensure long-term, sustained engagement, we foster a work experience that supports productivity and performance, and energizes our colleagues' individual physical, interpersonal and emotional well-being.

“I am proud to share that our 2021 Sustainable Employee Engagement composite score was 84%. This is four points higher when compared to the U.S. banking benchmark, and our Inclusion Index score was also 84%, 2% higher than the benchmark. These scores represent responses to questions such as, ‘People of all cultures and backgrounds are respected and valued here,’ ‘I can be my authentic self at Comerica without worrying about how I will be accepted,’ and ‘My work gives me a sense of personal accomplishment.’”

**Megan Burkhart**

Executive Vice President, Chief Human Resources Officer

In 2021:

**80%**

of colleagues participated in our engagement survey

**11**

of 12 engagement categories surpassed industry benchmarks

**94%**

of respondents said that Comerica's response to the COVID-19 pandemic was excellent

## Communicating with Colleagues

At Comerica, we believe in regular honest, transparent communication between leaders and colleagues. This is an important factor in maintaining and enhancing our collaborative work environment, where colleagues are treated with dignity and respect. We also use a variety of communication channels, including email, our Comerica intranet, town halls and one-to-one discussions, to engage colleagues and keep them informed. Additionally, we recognize the relationship between our managers and colleagues is an important key to our success. In 2021, to underscore the importance of this relationship, Comerica launched a number of new resources to help ensure our managers have the tools and information they need to successfully connect with and lead their teams, including a monthly manager newsletter, opportunities to participate in quarterly small-group market president meetings, and an annual all-manager virtual town hall.

## Engagement Around Purpose

To empower our colleagues and stay relevant, we embed purpose across our employment journey, as colleague participation and engagement is a powerful driver of our DEI, environmental sustainability and community involvement efforts. Examples of these engagement activities include our Master of Diversity Awareness and Master of Sustainability Awareness programs, green office teams and a variety of volunteering events in our local communities. For additional information, view the [Community section](#), [DEI section](#) and [Environment section](#) of this report.

## Comerica Cares Fund

Established in July 2020, the Comerica Cares Fund provides relief in the form of one-time grants to colleagues in need due to a disaster or personal hardship qualifying event that isn't compensated by insurance. The Comerica Cares Fund receives corporate contributions as well as voluntary donations provided by colleagues who want to assist their peers who are facing unexpected financial challenges.

### Impact (July 2020–December 2021):

<b>1,026</b>	<b>103</b>	<b>\$122,950</b>
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colleagues donated to the Comerica Cares Fund

applications approved

in Comerica Cares Fund grants approved and distributed for hardships including home damage, domestic abuse, COVID-19 related hardships and unexpected healthcare costs.

## Health, Safety and Well-being

At Comerica, we continually evaluate our benefit programs to ensure they meet the needs of our colleagues and to enhance current offerings. As part of the total rewards offering, Comerica provides a wide range of programs and supplemental services to help colleagues meet their personal needs and goals. We have always placed an emphasis on offerings that promote the physical and financial health of our colleagues.

We provide comprehensive medical coverage where Comerica covers approximately 70% of the cost, in addition to a range of supplemental health plans, so that colleagues have the coverage they need when they need it most. We provide an active pension, a 401(k) with matching contributions and financial coaching.

Throughout all of our programs, we also focus on supporting our colleagues' mental health.

### Physical Health

Medical

Critical Illness

Dental

Hospital Indemnity

Vision

Short/Long-term Disability<sup>2</sup>

Accident

Long-Term Care

### Financial Health

Retirement Income Account Plan (pension plan)

Health Saving and Spending Accounts<sup>3</sup>

401(K) Plan and Employer Match

Financial Coaching through Ayco

Life Insurance, AD&D and Dependent Life

ID Watchdog Identity Theft program

Employee Stock Purchase Plan

Student Loan Refinancing  
Auto and Home program

### Mental Health

Paid Time Off program

Affordable access to mental health professionals via our medical plans

Paid Holidays

Employee Assistance Program (EAP) offering support for various colleague needs, provided through ComPsych.

### Other

Tuition Assistance<sup>2</sup>

PerkSpot CoPerks Discount online shopping program<sup>4</sup>

Group Legal

Pet Insurance

Adoption Assistance<sup>4</sup>

Veterinary Discount Plan

Parental Leave<sup>4</sup>

<sup>2</sup> Benefits available to full-time colleagues who are scheduled to work 40 hours per week.

<sup>3</sup> Including Health and Dependent Care Flexible Spending Accounts, Commuter Benefits, and Health Savings Accounts.

<sup>4</sup> Introduced in 2021.

As part of our commitment to continually evaluate our health and welfare benefit offerings, we launched the following programs in 2021. These offerings provide additional support for colleagues to meet financial, family and personal goals and improve overall well-being.

- Adoption Assistance program to support colleagues with growing families
- Promise Champions, a new corporate recognition program
- Enterprise-wide mentoring program
- Paid time off for cultural observances
- Enhanced focus on mental health offerings

## COVID-19 Response: Keeping Colleague and Customer Welfare at the Forefront

Over the course of the pandemic, our strategy consisted of a continued phased, flexible approach to a full return to office. We monitored our progress while taking into account any changes in health metrics and Centers for Disease Control and Prevention (CDC), State and local guidance and while keeping the health and safety of colleagues and customers as the top priority.

At the start of the pandemic in 2020, we enabled up to 65% of our colleagues to work from home immediately and protected our essential workers with the proper personal protection equipment (PPE) and safety measures such as social distancing, cleaning, ventilation, limited building access as needed for colleagues and customers, daily health attestation, contact tracing and quarantines, as needed.

Throughout 2021, we continued to provide colleagues many enhanced benefits to support remote working, childcare needs and other family support. Going forward, most of our colleagues will be working in a hybrid model, allowing for some flexibility to work from home.

## WorkBest: Optimizing the Return to Office

As we now enter our return to office phase, we listened to what mattered to our colleagues. We adopted a deliberate and cautious approach and a long-term model that allows for flexibility while reigniting opportunities for synergy, collaboration and ongoing engagement.

Starting in 2021 in response to the continuing COVID-19 pandemic, we established the WorkBest program to align our return-to-office policies with our workspaces and how individual positions work best—100% on-site or through a hybrid model combining remote work with an on-site presence. In establishing the WorkBest program, we took into account feedback from leaders, managers and colleagues on where they believe work should be done in the future, ensuring we evaluated the best work scenarios for each position. The WorkBest program achieves the following:

- Through business-driven decisions, recognizes that different positions “WorkBest” in different ways
- Maintains our culture and enables colleagues to participate in rich collaborative experiences while building strong working relationships
- Provides the flexibility expected by colleagues, and the support necessary for them to do their best work, no matter where they are located
- Helps optimize the Comerica real estate footprint, with fewer colleagues in the office every day

### Caring for Our Colleagues

In 2020 and 2021, 8,000 payments were made totaling

# \$3.7 million

Dependent care stipends provided assistance to colleagues who were required to work in the office during the pandemic, enabling them to secure alternate care when normal dependent or elder care arrangements were disrupted by COVID-19.

During 2020 and 2021, 29,000 payments were made, totaling

# \$14 million

Our Special Pay program provided pay to colleagues who could not work due to COVID-19.

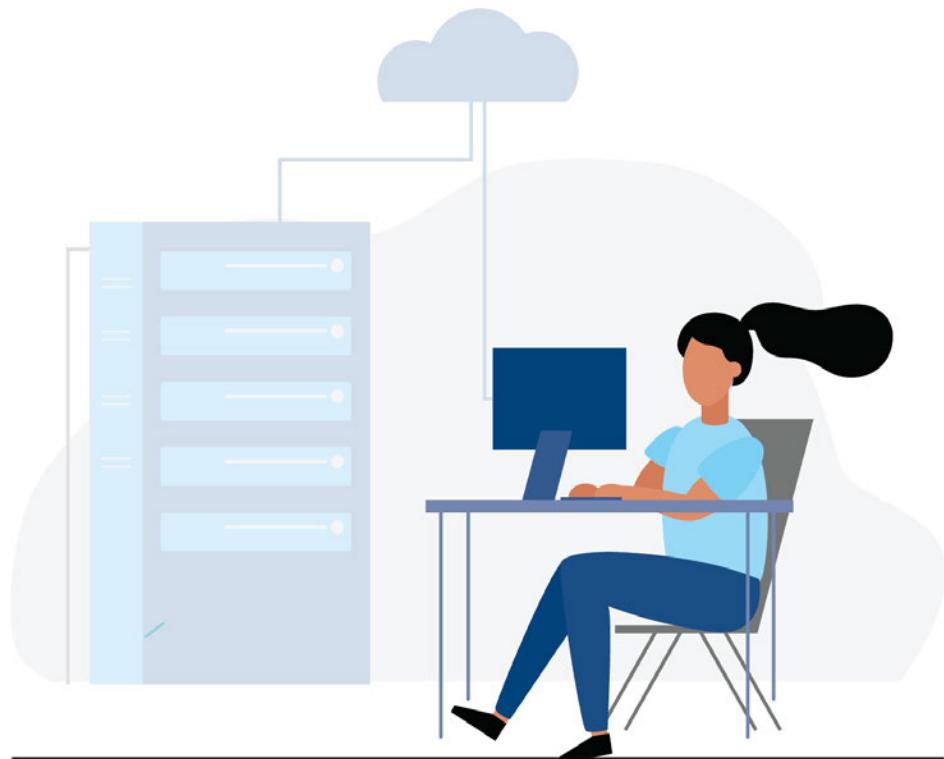
We provided enhanced cleaning, PPE supplies, plexiglass dividers, sanitizing stations and safety signage while ensuring facility readiness for returning colleagues and putting colleague health and safety first throughout return to office decision-making.

# Enabling a Remote Workforce

To better equip colleagues working remotely throughout 2021, Comerica provided laptops, softphone technology and Microsoft Teams; quadrupled our virtual private network (VPN) capacity; and held “Teams Talk” and “Return to Office” open forums, which were attended by more than 1,000 colleagues.

## Driving Innovation

- WorkBest program: Our long-term, flexible work model to ensure synergy, collaboration and ongoing colleague engagement. Additional information on the program can be found in the **Health, Safety and Well-being subsection** of this report.
- SHINE manager communications
- Comerica health app
- Digital mail
- Reporting dashboards
- Everbridge Emergency Alert System



# Recognized for Critical Event Management

Comerica Bank earned Everbridge's Best in Enterprise Resilience™ Certification Gold Tier assessment rating for our critical event management (CEM) program. This designation recognizes significant strengths in deploying technologies and practices to manage enterprise readiness, responsiveness and resilience during a critical event. The Everbridge assessment highlighted Comerica's strengths in four competency areas:

## Data and Analytics

Comerica actively monitors numerous intelligence sources and maintains a contact database of all colleagues and contractors. The database is synchronized with the human resource management system to ensure daily updates.

## Digital Transformation

Comerica continuously pursues technologies, workflows and solutions to improve operations. Leadership is actively involved in managing critical events, and plans are updated, managed and distributed online.

## Smart Process Automation

Comerica's security console is a 24/7 alarm monitoring center that provides centralized access to physical access control and visitor management systems. Comerica's CEM platform and risk intelligence feeds identify risks to assets when certain thresholds are met and send notifications to the security console.

## Communication and Collaboration

The security console immediately sends alerts if an imminent threat is detected, using multiple delivery methods to ensure colleagues receive critical information.

# Diversity, Equity and Inclusion

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# Diversity, Equity and Inclusion

**Our ESG Platform includes a commitment to promote a diverse, equitable and inclusive workforce, because fostering a diverse, equitable and inclusive culture throughout our organization and beyond makes our company stronger and helps us better serve our customers and communities.**

## DEI at Comerica

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, inclusive 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.

Our goal is to create a workplace where the best talent seeks employment. We know that diversity, equity and inclusion in the workforce will support our mission of helping people be successful. A diverse and inclusive workforce helps by connecting us to a wider customer base, enhancing our community relations and enriching our pipeline of new ideas and approaches to serve all communities. Comerica is committed to ensuring a diverse workforce, inclusive of those who possess different ancestries, races, colors, religions, genders, national origins, ages, physical and mental abilities, medical conditions, veteran status, marital status, heights, weights, sexual orientations and gender identities.

Comerica's Chief Diversity Officer, who reports to the Chief Human Resources Officer and the Chairman, President and CEO, manages all aspects of DEI as they relate to current and potential Comerica colleagues. This oversight includes the design and execution of internal and external Comerica DEI programs, initiatives and funding.

### DEI Metrics at year-end 2021

**65%**

of U.S. colleagues are women

**41%**

of U.S. colleagues are racial/ethnic minorities

**52%**

of Comerica managers are women

“Diversity is not only a Comerica Core Value, but also a business imperative. At Comerica, we work hard to support a diverse, innovative and inclusive culture. This results in colleagues who enjoy a tremendous work family. Because of this foundation of inclusion, new colleagues can assimilate into the culture while feeling welcomed right from the start. There are no outsiders.”

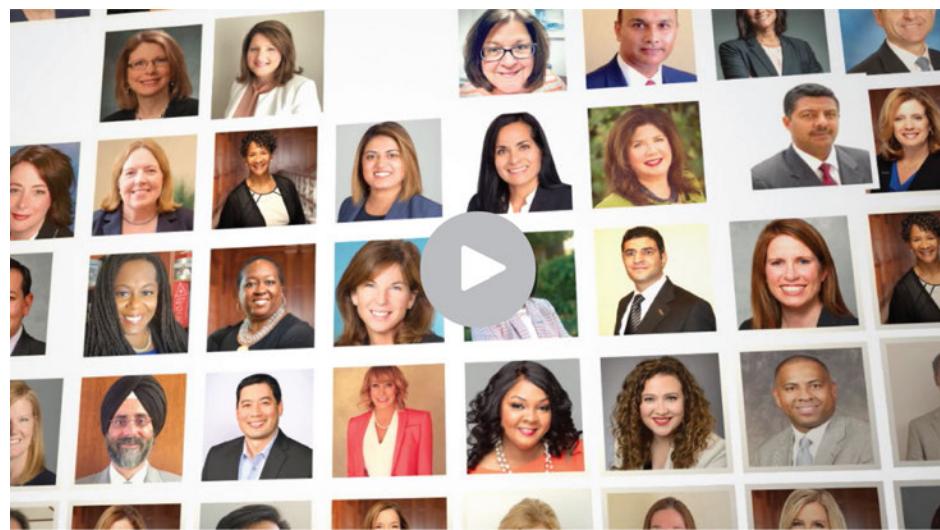
**Nate Bennett**

Senior Vice President, Chief Diversity Officer and Head of Talent Acquisition

### Accountability and Commitment: Our Statement as We Stand for Social Justice and Racial Equality

As one of Comerica's Core Values, our respect for diversity permeates everything we do. Our diversity standards recognize behavior that:

- Uses and values similarities and differences in people to create a work environment that encourages creative thinking and solutions
- Stands for social justice and racial equality for all communities and against policy and actions that create inequities within our communities
- Recognizes and leverages the benefits of a broad range of ideas, viewpoints and backgrounds working together to produce superior products and services for a diverse marketplace
- Embraces the inclusion of all talented and qualified individuals, regardless of differences in beliefs, experiences, backgrounds or physical characteristics
- Treats all colleagues, customers and suppliers fairly, with dignity and respect

**DEI VIDEO: WORDS**

[\*\*CLICK HERE TO WATCH VIDEO\*\*](#)

## Executive Diversity Committee

Internally, leadership and accountability for our DEI efforts start at the highest levels of the company. Our Executive Diversity Committee (EDC), chaired by our Chairman, President and CEO and comprised of our executive leadership team, Chief Diversity Officer and Chief Community Officer, sets the strategy and addresses key issues and topics relating to DEI. EDC members, as well as all senior officers, are required to include diversity and inclusion as part of their annual performance management plan, as measured through a Diversity and Inclusion Scorecard. EDC members also include diversity objectives throughout their lines of business.

The EDC addresses important strategic issues relating to diversity and inclusion, including the attraction, retention and development of diverse employees. The EDC provides guidance in tandem with the Chief Diversity Officer, who leads the Diversity and Inclusion team and implements the diversity and inclusion strategy. The EDC sets annual and long-term internal diversity goals focused on four strategic areas:

**Corporate Governance**

**Education**

**Workforce Diversity**

**Social Impact**

### Executive Diversity Committee

- Chairman, President and CEO
- Chief Audit Officer
- Chief Community Officer
- Chief Diversity Officer
- Chief Experience Officer
- Chief Financial Officer
- Chief HR Officer
- Chief Legal Officer
- EVP, Commercial Bank
- EVP, Corporate Responsibility
- EVP, Retail Bank
- EVP, Technology and Operations
- EVP, Wealth Management

### EDC Diversity and Inclusion Strategic Focus

- Diversity Scorecard performance year in review
- Sustainability, Community and CRA performance report out
- Board of Directors education and updates
- Racial equity and social justice programs and policy support. Inclusive leadership programming and education
- Environmental, Social and Governance strategic direction strategy
- Workforce representation performance
- Emerging talent programming
- CEO Action for Race and Equity fellowship review
- Supplier diversity performance and strategy
- Inclusion and belonging strategy
- Workforce advocacy group partner reviews and updates

### 2022 Priorities

- Increase Black and Hispanic representation within Emerging Talent Programs for the Commercial Bank and Technology.
- Building the next generation Inclusive Leaders through Inclusive Leadership training.
- C-Suite reverse mentoring program to improve empathy to achieve Comerica's diversity scorecard targeted goals.
- Advance support for the CEO Action for Race and Equity 3 Social Contracts.

**2021 Priorities****Progress****Corporate Governance**

Improved ethnic diversity for senior leaders and gender diversity for Vice Presidents.


  
Complete
**Corporate Governance**

100% of the business lines met diversity scorecard performance goals in 2021.


  
Complete
**Corporate Governance**

Increased supplier diversity spend by \$50M and achieved 98% inclusion.


  
Complete
**Workforce Diversity**

Launched the Diversity, Equity and Inclusion Education Council (DEIEC), as well as the European Connection and Asian and Pacific Islander Employee Resource Groups.


  
Complete
**Workforce Diversity**

Achieved positive representation growth for Black and Hispanic Senior leaders and Vice Presidents.


  
Complete
**Education**

Completed Parts 1 and 2 of Conscious Inclusion Journey training (topics include: Expand thoughts, Assess and challenge bias, Adapt, modify or change behavior.)


  
Complete
**Education**

Increased the participation rate for Comerica's elective DEI education: the Master of Diversity Awareness program.


  
Complete
**Social Impact**

Contributed over 30,000 volunteer hours to nonprofits.


  
Complete
**Social Impact**

Delivered over \$50,000 to colleagues through the Comerica Cares Colleague Relief Fund.

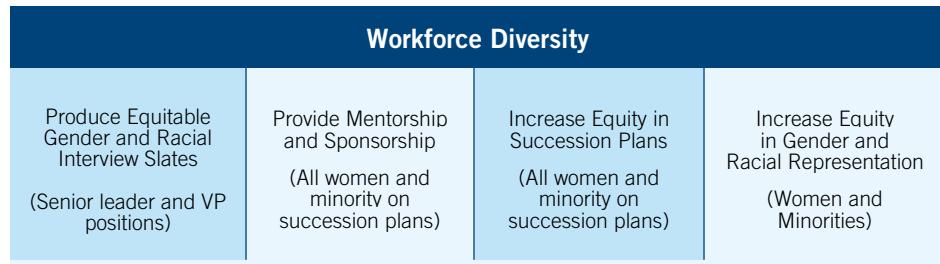

  
Complete
**Social Impact**

Delivered over 5,000+ CRA qualified service hours.


  
Complete


## Comerica DEI Scorecard

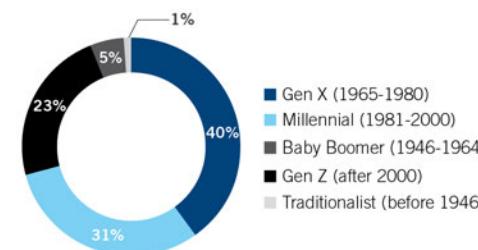
Comerica's DEI Scorecard acts as the quantitative measurement tool used to ensure progress towards documented goals, both short-term and long-term. Additionally, each Senior Officer in the company is held accountable towards contributions to achieving the goals on an annual basis. In 2021, 100% of business units met their DEI performance goals.



## Workforce by the Numbers

Banking has always been a business that relies heavily on the personal relationships and the quality of service provided by employees, and one of Comerica's strength has always been its colleagues. To meet and exceed our customers' expectations, we strive to make Comerica the preferred place to work in our markets. We recognize our colleagues' hard work, and we are dedicated to fostering a diverse and inclusive workplace.

### BY THE NUMBERS WORKFORCE GENERATIONS



### EMPLOYEE TENURE FOR 2021 (%)



Our efforts to recruit and retain women and ethnic minorities throughout 2021, especially in leadership positions, has resulted in the following female and minority colleague composition across all business sectors in the U.S.

	Female(%)	Minority(%)
All Colleagues <sup>5</sup>	65	41
Officials and Managers <sup>6</sup>	52	29
Executive Officers <sup>7</sup>	43	21

For additional information on diverse colleague recruitment, development and retention activities, see our [Colleagues section](#).

<sup>5</sup> For further colleague diversity information by job categories, see our [2021 Employer Information Report EEO-1](#).

<sup>6</sup> Based on EEO-1 job classifications

<sup>7</sup> Using Securities and Exchange Commission definition

# Attracting Diverse Talent

Our colleagues are critical to our business success, and the success and well-being of our colleagues is a priority. Our recruitment practices ensure that we hire the best candidates with the appropriate skill sets and values, pay appropriate and competitive wages, and provide benefits that fit our demographics. Comerica's learning and development activities provide top quality training and development for all colleagues, from compliance to skills training, and support managers and employees through counseling and by facilitating talent management reviews.

DEI is an integral part of our attraction, recruitment and promotion efforts, which include built-in fundamental practices to ensure diversity in the talent pipeline. We work hard to attract and retain the best talent from all backgrounds. Our Diversity Recruiting Strategy delivers a qualified diverse applicant pool that reflects the demographics of our markets through a focus on women, minority populations, individuals with disabilities, veterans and colleagues of varying ages.

## 2021 CANDIDATES

**61%**

Ethnically Diverse Candidates

**59%**

Women Candidates

## 2021 NEW HIRES

**53%**

Ethnically Diverse

**60%**

Women

**2%**

Veteran

**4%**

People with Disabilities

## 2021 LEADERSHIP DEVELOPMENT PROGRAM CANDIDATES

**22%**

Ethnically Diverse

**44%**

Women

## 2021 EMERGING MANAGER DEVELOPMENT PROGRAM CANDIDATES

**39%**

Ethnically Diverse

**61%**

Women

## Recruiting Networks

In addition to connecting with diverse student organizations on college campuses and community-based organizations in our local markets, we have developed relationships and sponsored recruiting events with the following organizations:

- Association for Latino Professionals in Finance and Accounting (ALPFA)
- Arab Community Center for Economic and Social Services (ACCESS)
- Hispanic Alliance for Career Advancement (HACE)
- National Association of Black Accountants (NABA)
- HBCU partnership – Texas Southern University
- Handshake – Emerging Talent

## 2021 TECHNOLOGY INTERN HIRES

**50%**

Ethnically Diverse

**56%**

Women

## 2021 TECHNOLOGY ENGINEERING COLLECTIVE

**75%**

Ethnically Diverse

**62%**

Women

## 2021 COMMERCIAL BANK INTERN HIRES

**37%**

Ethnically Diverse

**63%**

Women

## 2021 COMMERCIAL BANK DEVELOPMENT HIRES

**50%**

Ethnically Diverse

**62%**

Women

Additional employee metrics can be found in the [Colleagues Key Metrics Table](#) and the [DEI Key Metrics Table](#).

# Pay Gap

We believe that businesses play a critical role in reducing the national pay gap affecting women and minorities. We are committed to identifying and promoting best practices to reduce bias in hiring, promotion and compensation decisions.

# Pay Equity

Our pay equity initiatives, as part of our broader DEI initiatives, make our company stronger and delivers value to our shareholders. We examine the main components of compensation, like salaries and bonuses, by grade level and position to ensure similar positions receive similar pay to the extent other factors can be equalized (e.g., time in position, performance, education). We also consider equitable benefits and look at policies and practices that potentially drive inequities. We have made a corporate-wide decision to prohibit the solicitation of salary history from applicants in all of our markets.



# Educating our Colleagues

Comerica colleagues participate in DEI awareness education through a variety of required and elective learning programs. Comerica requires DEI education for all new hires, new managers and for all colleagues annually. Additionally, Comerica's leadership team is required to include diversity and inclusion in their annual performance reviews and to include diversity objectives throughout their business lines.

## Diversity, Equity and Inclusion Education Council

In 2021, we launched the Diversity, Equity and Inclusion Education Council (DEIEC), a group of over 25 colleagues across markets and departments that promotes diversity, equity and inclusion on a corporate-wide basis through awareness, anti-racism and inclusion education focusing on creating a culturally competent organization. DEIEC's strategic priorities include:

- Developing education programs, events and activities focusing on topics such as diversity and inclusion awareness, anti-racism, equity, allyship, microaggressions and unconscious bias.
- Representing the interests and needs of colleagues across our markets and recommending education as necessary.
- Celebrating differences in cultures through education.

## Required Education

In 2021, 100% of Comerica colleagues completed their annual, required DEI education provided by Comerica's Diversity, Equity and Inclusion department focused on inclusion. Some of the topics covered in the education sessions in 2021 included tools and information related to diversity, equity, belonging and inclusion and how these topics benefit a diverse workforce. Additionally, all new colleagues and new managers are required to take DEI education focused on leveraging diversity to create an inclusive work environment.

## Conscious Inclusion Journey

Comerica's conscious inclusion journey looks to move from solely focusing on diversity to creating a culture of inclusion and belonging. The journey consists of a three year strategy to improve inclusive leadership skills for executive leadership, senior officers, managers and DEI partners throughout the company. Key focus areas include improved cultural awareness, advancing empathy to build stronger compassion and building followership through valuing all identities. In 2021, Comerica implemented a two-session course that aimed to help Comerica colleagues to expand thoughts, assess and challenge bias, and adapt, modify or change their behavior.

## Diversity Dialogues and Business Unit DEI Education

During 2021, Comerica successfully completed more than 40 diversity dialogue and DEI education sessions for over 1,500 colleagues and leaders. The sessions included topics such as unconscious bias, microaggressions and generational differences.

## Master of Diversity Awareness (MDA) Program

Our company-wide MDA program is a foundational program to Comerica's diversity education platform focused on creating cultural awareness amongst our colleagues. This elective program was developed to advance the cultural awareness of the many identities that exist at Comerica. The 10 dimensions of diversity covered are as follows:

- 1. Age/Generation**
- 2. Cognitive Style**
- 3. Gender**
- 4. Leveraging Diversity and Inclusion in the Workplace**
- 5. Mental/Physical Ability/Appearance**
- 6. Race/Ethnicity/National Origin**
- 7. Religious/Spiritual Beliefs**
- 8. Sexual Orientation/Gender Identity**
- 9. Work/Life Balance**
- 10. Veteran/Military**

The MDA program provides certifications at bronze, silver, gold and platinum levels. In 2021, 85% of Comerica colleagues were enrolled in the program:

COLLEAGUES	INCREASE OVER 2020
<b>Bronze-level certified</b>	4,857
<b>Silver-level certified</b>	4,076
<b>Gold-level certified</b>	3,412
<b>Platinum-level certified</b>	2,099

# Diversity Employee Resource Groups (ERGs)

Comerica continued to encourage the formation of ERGs to help support and sustain our diversity, equity and inclusion model. ERGs consist of colleagues with common interests organized to promote cultural awareness, career advancement, colleague connection and community impact. They also provide awareness building with the general Comerica population and Comerica management and help support Comerica's Diversity, Equity and Inclusion model. Our ERGs also help manage the equity versus equality conversation.

In 2021, we launched our ninth and 10th ERGs: the Comerica Asian and Pacific Islander and the European Connection. These 10 ERGs support more than 2,100 Comerica colleague members.

## 10 ERGs with 19 chapters in California, Michigan and Texas

- Comerica African American Network
- Comerica Asian Indian Association
- Comerica Asian and Pacific Islander
- European Connection
- Mi Gente
- PRISM – LGBTQ+
- Quantitative Professionals
- Veteran's Leadership Network
- Women's Forum
- Young Professionals Networks

## Comerica African American Network (CAAN) ERG at Work in Michigan:

The Michigan CAAN chapter is Comerica's longest tenured resource group, dating back more than 30 years. Each year, it organizes Comerica support for the annual United Negro College Fund Detroit Walk of Education, which shifted to virtual events the past two years. Our 2021 Comerica colleague support tally totaled an eight-year high of nearly \$23,000. Other CAAN initiatives included filling bags with school supplies for Detroit PAL's back-to-school backpack giveaway.

## 2021 Awards

National and regional organizations and publications have taken note of our deep-rooted commitment to DEI and placed Comerica among the top U.S. companies for efforts to recognize and support DEI practices. 2021 recognitions include:



### DiversityInc Top 50 Companies for Diversity Noteworthy list



### Black EOE Journal – The Employment and Entrepreneur Magazine Best of the Best list



### Five Star rating on all Pillars of Governance – Hispanic Association on Corporate Responsibility Corporate Inclusion Index



### Best Employer for Women 2021 by Forbes



### National Diversity Council Index notable mention



### Perfect Score of 100 for seventh consecutive year – Human Rights Campaign Foundation's Corporate Equality Index (for LGBTQ equality)



### LATINA Style's Top 50 Best Companies for Latinas to Work for in the U.S. list – the tenth time Comerica has received the honor



### Michigan's Veteran Affairs Agency's Gold-Level Veteran-Friendly Employer certification for extensive efforts to recruit, train and retain military veterans



### Points of Light "The Civic 50" list of the top 50 U.S. most community-minded companies

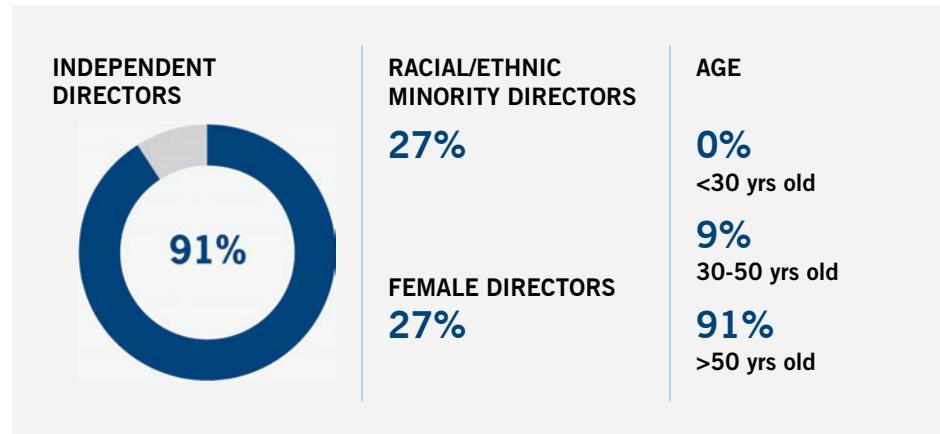


### "Best in Class" for Excellence in Supplier Diversity Award – Great Lakes Women's Business Council

# Board Diversity

Comerica strives to have a diverse Board that represents the interests of four of Comerica's core constituencies: shareholders, employees, customers and communities. The Governance, Compensation and Nominating Committee considers diversity broadly in assessing potential director nominees. For example, the Committee seeks 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.

The Board's composition at year-end 2021 included:



Our **Corporate Governance Guidelines** outline the Board's evaluation process, which includes an annual self-evaluation of the full Board and its committees that focuses on areas for improvement.

Two of Comerica's female Directors hold key Board leadership positions, including Independent Facilitating Director and Governance, Compensation and Nominating Committee chair. In addition, one of Comerica's racial/ethnic minority Directors is the chair of the Enterprise Risk Committee.

## Diverse Board Leadership



**Jacqueline P. Kane**

Title: Governance,  
Compensation and  
Nominating Committee  
Chair



**Michael E. Collins**

Title: Enterprise Risk  
Committee Chair



**Barbara R. Smith**

Title: Facilitating Director

# Supplier Diversity

As a large, national corporation, we rely upon an ever-increasing network of business and supply chain partners to meet the needs of our customers. We are committed to pursuing a diverse supplier base that encourages the growth of enterprises owned by minorities, women, veterans, persons with disabilities and members of the lesbian, gay, bisexual and transgender community. Our Comerica Supplier Diversity program is based on four pillars that help us engage, include, select and cultivate diverse suppliers based on specific criteria.

## Supplier Diversity Program Identification and Selection Criteria

### BUSINESS QUALIFIES IF AT LEAST 51% OWNED, OPERATED AND CONTROLLED BY U.S. CITIZENS WHO ARE MEMBERS OF THE FOLLOWING GROUPS:

- African Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, Indian Americans and other individuals found to be qualified by the Small Business Administration (SBA) under 13 CFR 124.105. Native Americans, as used in this provision, means American Indians, Eskimos, Aleuts and native Hawaiians
- Disabled individuals
- Women
- Veterans
- Lesbian, gay, bisexual and transgender individuals

### BUSINESS SELECTION BASED UPON:

- Quality products and services
- Competitive pricing
- Adherence to delivery schedules

Our standard agreement with suppliers and contractors requires that they act in compliance with all applicable laws, including those on equal employment opportunity, employment practices, immigration and data protection, and abide by Comerica's non-discrimination and diversity practices. As Comerica primarily does business in the United States, we have no significant presence or investment in countries where lack of human rights protection is a known problem.



## Goals and Initiatives

In 2021 we increased the focus on building the supplier diversity pipeline by adding a goal around including diverse suppliers in competitive sourcing activities. Our success in 2021 has encouraged us to establish a 2022 goal to include diverse suppliers in 100% of in-scope requests for proposal. This metric is tracked quarterly and included in our Executive Diversity Scorecard. We exceeded all of our supplier diversity sourcing objectives in 2021, including inclusion, spend and penetration.

We request Tier 1 strategic supply partners to support our diversity initiatives by sourcing diverse suppliers of their own and reporting their spend to us on a quarterly basis. We also encourage the development of diverse supply chains in our Tier 2 program by including requests for diversity information in all requests for proposals. In 2021, 98% of requests for proposals included diverse suppliers and 33% of proposal awards went to diverse suppliers.

## 2021 Supplier Diversity Goal Achievements

Nearly

**98%**

of completed projects included diverse suppliers, exceeding our goal by

**6%**

**\$50.3M**

spent with diverse suppliers, exceeding our spend goal by

**37%**

# Amplifying our DEI Impact

In 2020, we announced a four-year, \$1 million commitment to launch the Black Capital Access Program, combining financial resources and technical assistance to support Black-owned businesses. Additionally in 2021, we moved \$5 million in deposits to Asian-American minority depository institutions. We also launched a national initiative to combat violence against Asian Americans and Pacific Islanders, committing \$100,000 in financial contributions and volunteer hours to nonprofit organizations. For more on Comerica's BRGs, see the [Business Resource Groups subsection](#) under the Community section of this report.

To further our efforts in building stronger relationship among diverse communities, we appointed national business development managers responsible for African-American, Asian-American Pacific Islander and Middle Eastern-American business development. The roles of these new positions complement the work of our Business Resource Groups (BRGs).

Also in 2021, Comerica granted 4 hours of paid time off for full-time colleagues and 2 hours paid time off for part-time colleagues to use for cultural or religious observances meaningful to them.

## DEI External Partnerships

We reinforce our DEI commitment and expand our social impact by partnering with other organizations focused on advancing and driving social justice/racial equity and inclusion in the workplace. We are proud to partner with multiple local partners in each of our key market areas and at the national level with the following organizations, including:

- National Diversity Council
- CEO Action for Diversity and Inclusion
- Inforum
- Urban Financial Services Coalition
- McKinsey and Company – Black Management Accelerator
- Executive Leadership Council
- National Association of Black Accountants
- Hispanic Association of Corporate Responsibility
- Hispanic Alliance for Career Enhancement
- Black Tie Dinner – LGBTQ nonprofit advocacy group

“Diversity is a core value of Comerica. It’s embedded in our business strategy, celebrated among our colleagues, and extended to our community and business partners. Embracing diversity and promoting equity and inclusion makes Comerica stronger and allows us to better serve our customers.”

**Curtis C. Farmer**

Chairman, President and CEO

## Business Outreach

We are committed to becoming the financial services provider of choice in the diverse communities we serve. Providing access to capital to all of our markets is critically important to Comerica's social values. See our [Financial Inclusion section](#) to learn more.

## Community Outreach

We take pride in the support we provide to our multi-cultural communities. We know that by building strong communities, our company will grow stronger. We are proud to be a partner of choice in our communities. See our [Community section](#) to learn more.

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# Community

**At Comerica, we understand that thriving communities are vital to our growth and business success. We help build strong and sustainable communities by providing financial resources that expand affordable housing, fuel economic development, promote financial literacy and increase access to financing for individuals and small businesses. Additionally, we partner with, volunteer with and donate to nonprofit organizations in the communities where we operate to help maximize our positive impact.**

Comerica's Chief Community Officer (CCO) oversees our community reinvestment efforts and all associated activities, including development, lending, community investments, volunteerism and data analysis. He is supported by Comerica's Director of Community and Development Lending. The CCO and other Comerica leadership receive feedback and counsel from Comerica's National Community Development Advisory Council (CDAC) and three regional CDACs that consist of 23-member representatives from across our national footprint, representing community interests in their respective regions. Comerica also informs the CDACs on pertinent CRA and business strategies to ensure that Comerica is meeting the needs of the community, particularly low to moderate income (LMI) communities who need us the most.

## 2022 External Affairs Community-Related Goals

- Strategic goal alignment to raise expectations across bank assessment areas by focusing on markets that were previously rated below Satisfactory to achieve an Outstanding CRA Rating on our 2023 CRA Exam.
- Continue the five Is (Intentional, Impactful, Innovative, Immediate, and Inclusionary) strategy to enhance community service, investments and lending opportunities via Community Development Financial Institutions (CDFIs) to better serve the community, particularly LMI communities.
- Expand focus to include the 3Bs Focus (Boys, Books, and Business).

## COMMUNITY VIDEO: THE STREETS



[CLICK HERE TO WATCH VIDEO](#)

## Community Investment and Development

Our community investment strategy is designed to create thriving communities and shared value by supporting the viability and well-being of the businesses and people that make up the communities where we operate. We focus our efforts on small business and community development lending programs, investing in tax credits for affordable housing, providing financial education and contributing time and money to causes and organizations we believe will positively affect our communities.

In 2021, Comerica appointed two additional External Affairs market managers to support national ethnically diverse business development. We also brought new business to and built vital bank relationships with minority depository institutions (MDIs), such as First Independence Bank, Broadway Federal Bank and Unity National Bank.

Named one of The Civic 50's Most Community Minded Companies for seven years

**In 2021, Comerica Bank originated 707 community and economic development loans totaling more than \$2.5 billion in the following categories:**

- Affordable housing for LMI individuals/geographies:** Financial education, loans or investments that support the development of rental or for-purchase housing, loans or investments that fund affordable mortgages or mortgage assistance programs, and board or committee service that support the provision of affordable housing in LMI communities or for LMI individuals or families
- Community services targeted to LMI individuals/geographies (health/family services and education):** Financial education, academic enrichment programs or resources, affordable childcare, workforce development/job training and affordable healthcare (including counseling)
- Economic Development (small business, small farm, and LMI job creation/ retention):** Activity for a SBDC, SBIC, Rural Business Investment Company, New Markets Venture Capital Company, New Markets Tax Credit eligible Community Development Entity, or CDFI that finances small businesses or small farms, financing intermediaries that lend to, invest in, or provide technical assistance to entrepreneurs, start-ups or recently formed small businesses or small farms, and providing technical assistance or supportive services to entrepreneurs, small businesses or farms, such as shared space, technology, or administrative assistance
- Revitalize or stabilize LMI areas:** Activities that revitalize or stabilize LMI geographies, distressed or underserved non-metropolitan middle-income geographies or designated disaster areas

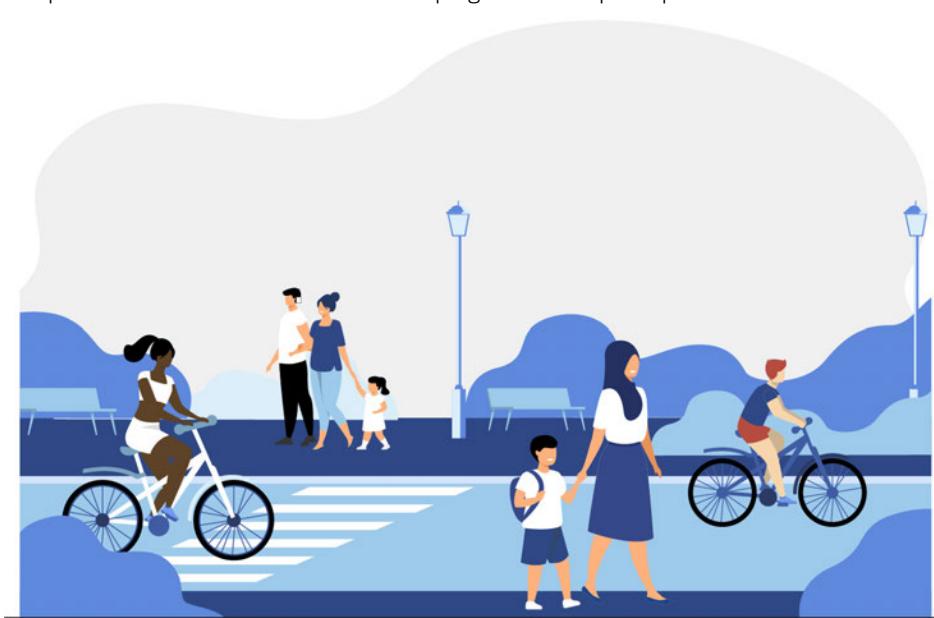
To keep community partners and others engaged in our community development activities, we continued distribution of our Comerica Community Insights e-newsletter to CDAC members, nonprofits and other centers of influence nearly every quarter. The newsletter provides information on the bank, highlights Community Partner tools and resources, our response to COVID-19 (including PPP updates), and CDFI and MDI partnerships. To help us better serve our local communities, we conducted community listening sessions to assist with the development of robust lending strategies and approaches to address the needs of underserved communities.

## 2021 COMMUNITY DEVELOPMENT LOANS BY PURPOSE (INCLUDING PPP LOANS IN ECONOMIC DEVELOPMENT)

	TOTAL #	\$ (000's)
<b>Arizona</b>		
Affordable Housing	0	\$0
Community Service	3	\$7,600
Economic Development	16	\$120,392
Revitalize and Stabilize	0	\$0
<b>TOTALS</b>	<b>19</b>	<b>\$127,992</b>
<b>California</b>		
Affordable Housing	18	\$48,914
Community Service	19	\$71,383
Economic Development	166	\$914,305
Revitalize and Stabilize	0	\$0
<b>TOTALS</b>	<b>203</b>	<b>\$1,034,602</b>
<b>Florida</b>		
Affordable Housing	3	\$450
Community Service	0	\$0
Economic Development	6	\$6,977
Revitalize and Stabilize	0	\$0
<b>TOTALS</b>	<b>9</b>	<b>\$7,427</b>
<b>Michigan</b>		
Affordable Housing	8	\$38,513
Community Service	32	\$36,867
Economic Development	261	\$760,167
Revitalize and Stabilize	7	\$78,532
<b>TOTALS</b>	<b>308</b>	<b>\$914,079</b>
<b>Texas</b>		
Affordable Housing	4	\$86,436
Community Service	8	\$8,846
Economic Development	143	\$305,749
Revitalize and Stabilize	7	\$42,831
<b>TOTALS</b>	<b>162</b>	<b>\$443,862</b>
<b>PPP Outside Assessment Areas</b>		
Affordable Housing	0	\$0
Community Service	0	\$0
Economic Development	6	\$9,138
Revitalize and Stabilize	0	\$0
<b>TOTALS</b>	<b>6</b>	<b>\$9,138</b>
<b>TOTAL</b>		
Affordable Housing	33	\$174,313
Community Service	62	\$124,696
Economic Development	598	\$2,116,728
Revitalize and Stabilize	14	\$121,363
<b>TOTALS</b>	<b>707</b>	<b>\$2,537,100</b>

## Community Reinvestment Act (CRA)

The Community Reinvestment Act is designed to encourage commercial banks and savings institutions to help meet the credit needs of borrowers in the communities where they do business, including in LMI neighborhoods. To support Comerica CRA activities, we have a dedicated team of nine External Affairs market managers who work with community partners to identify and support the needs of the markets where we operate. They work closely with our CRA Working Group to establish goals and benchmarks and with our CRA compliance team to monitor and measure progress and improve performance.



CRA-related guidance and recommendations are made based on feedback received from our CDACs, other trusted community partners, data analysis, peer analysis, research related to current market conditions and the results of our CRA examinations.

Comerica received a Satisfactory rating on our most recent CRA exam, issued February 8, 2021. Factors supporting this rating include:

- The Paycheck Protection Program (PPP) was established by the United States federal government in 2020 through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to help certain businesses, self-employed workers, sole proprietors, certain nonprofit organizations, and tribal businesses continue paying their workers. In 2020, Comerica originated 177 PPP loans in the amount of \$458 million to businesses that have community development purpose and/or are located inside LMI geographies.
- Comerica's small business loan originations were made to all geographies and income levels in the majority of our markets, and CRA assessment areas was highlighted as good.

- Comerica has maintained our CRA contributions and low-income housing tax credit investments, but in 2020 Comerica increased our CRA qualified investments to include investments to CDFIs and MDIs. Due to the pandemic, CRA qualified service hours decreased in 2020, but Comerica was responsive to the COVID-19 pandemic by performing food distribution and virtual financial education services.
- In late 2020, Comerica also moved \$10 million in deposits to MDIs, as well as established mutual mentoring relationships with these institutions. MDIs assist minority and underserved communities and foster economic viability in their communities. In 2021, Comerica responded to the growing need for access to capital in the Asian American community by establishing new partnerships with two Asian American MDIs: Royal Business Bank (Los Angeles, California) and First Choice Bank (Cerritos, California). The partnerships include Comerica providing \$2.5 million in deposits to each for their efforts to support access to capital and foster economic viability amongst Asian Americans and Pacific Islanders.
- Comerica Bank and the Comerica Charitable Foundation announced a commitment to invest approximately \$16 million in 2021 to support small businesses and communities impacted by COVID-19. This support is in addition to the \$11 million in 2020 that was directed toward small business relief and nonprofits providing essential needs, such as food and supplies, as a result of the pandemic.
- As of December 31, 2021, Comerica increased and developed strong partnerships with 35 CDFIs, viewed as the most impactful investments to address the needs of our communities.
- Comerica launched gomerica, a mobile bank to provide a unique way to bring its business directly to local communities and one that helps fill a void in underserved neighborhoods that often struggle to obtain easy access to banking services.

To share CRA best practices, benchmark our performance and achieve the greatest possible impact, Comerica participates in peer bank meetings across our markets. We require new External Affairs staff to take our in-house CRA training, and our External Affairs team provides CRA-related training to other relevant colleagues, such as the nearly 300 senior officers and executives who received the Diversity Scorecard 3-hour CRA Service Initiative training goal and 845 Comerica Financial Education Brigade members who serve in mostly LMI communities. In 2021, our External Affairs team hosted a CRA Event Series for all colleagues on the importance of CRA to Comerica and our communities. CRA-trained volunteers delivered more than 8,300 CRA-qualified service hours to more than 100 organizations across all markets.

Comerica's External Affairs team trained nearly

# 1,000 colleagues

on CRA-related topics in 2021.

For more information, refer to the [Community Reinvestment Act page](#) on Comerica.com.

## Investing in Neighborhood Revitalization and Small Businesses

To support the small businesses and entrepreneurs that make up the backbone of local economies, Comerica provides loan capital to microenterprise loan funds and CDFIs where we operate. We also look for opportunities to fund organizations that provide technical assistance and financial education to small businesses. For more specifics on small business support, refer to our **Small Business Support subsection** in the Customers section of this report.

To further help serve the needs of our communities, we provide a vital component of financing to community development projects through investments in qualified tax credit-financed real estate. Our tax credit investing enables us to direct financial resources for the greatest social impact in the communities where we have the strongest connections.

## Established Affordable Housing Tax Credit Lending Team

In 2021, Comerica established a dedicated lending team to provide loans to community development projects that addressed specific needs in low-income communities through tax credit-financing. This included support for quality housing, nearby employment opportunities and social/educational services for LMI communities, residents with special needs, military service veterans and seniors. Our 2021 low-income housing tax credit equity investments totaled \$75 million creating safe, decent, affordable housing for low-income individuals and households in our primary markets.

**\$8 million of equity and a \$7 million construction loan were provided to an apartment complex in Southeast Michigan. Project benefits included:**

- Affordable housing for those earning 30 – 80% of the Area Median Income
- 30 newly constructed units, of which 11 will be set aside as Permanent Supportive Housing for chronically homeless individuals and households
- Wrap around services to include benefit assistance, mental health services, financial management, employment training and literacy services
- Green development seeking LEED – Silver Certification

**A \$10 million investment in a \$40.6 million New Market Tax Credit Fund, which accounted for 24.7% ownership. The investment went to two developments in qualified low-income communities in Texas and provided benefits such as:**

- Permanent job creations in Michigan and Texas, including construction jobs needed to build the developments
- Access to affordable, fresh and healthy food through the construction of a new warehousing and storage facility in San Antonio that expanded an existing food bank's capacity for perishable food donations
- Creation of six more production lines at a Grand Prairie manufacturing facility that produces corn and flour tortillas, corn chips, flatbreads and other foods



# Financial Education

**Our ESG Platform includes a commitment to invest in financial education for underserved communities because we understand that Comerica thrives when our customers and communities are informed.** Financial education is a cornerstone of our efforts to help build and support stronger communities. We provide financial education opportunities for students, adults and business owners. In 2021, we increased our virtual financial education COVID-19 response focused on supporting small businesses, women and girls and seniors. Comerica produced more than 550 financial literacy events and programs in diverse communities.

- More than 50,000 LMI individuals took part in Comerica \$ense financial education sessions with nonprofit partners for adult, seniors, youth (including pre-K) and young adults, representing a 45% increase from 2020 outreach.
- Comerica's impact on local communities in 2021 included 380 small business bootcamps hosted across its markets, assisting over 17,000 small businesses.
- We also hosted nearly 40 events for women, girls and seniors and over 10 Youth Entrepreneurship (YES) programs for over 200 youth entrepreneurs resulting in an annual competition in the U.S. Virgin Islands.

Comerica's Business \$ense Bootcamps were recognized with a LiFE (Leaders in Financial Education) Award by the Texas Bankers Foundation during its annual conference.

Comerica's Financial Education Brigade (CFEB), designed to meet the growing need for more financial education in our communities, provides structure, oversight, trainers and volunteers for many of these programs. This team of Comerica colleagues is committed to delivering on the Comerica Promise in LMI communities in all our markets. All CFEB members are trained to teach financial education on behalf of Comerica. They support Comerica's small business-related efforts along with community support programs. Read more on these activities in the **Financial Inclusion subsection** of the Customers section of the report.

In addition to our own programs, Comerica provides financial support to nonprofit organizations dedicated to developing financially literate communities, including organizations such as Junior Achievement, EverFi, Project Still I Rise, the Black Chamber of Arizona, Habitat for Humanity, Asian, Inc., ACCESS and Network for Teaching Entrepreneurship to teach personal finance basics to people in underbanked areas.

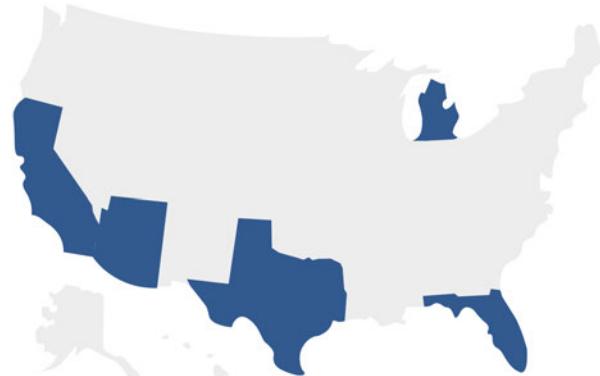
# Business Resource Groups

Our Business Resource Groups (BRGs), under the leadership of Comerica's Chief Community Officer, also provide business development and community outreach support, partnering with relevant associations and nonprofits. Since each BRG is focused on creating strategies to support and promote business outreach and financial education to a specific community group, their goals and efforts target a narrower pool of community members.

Comerica's 19 BRGs contributed to

**\$418M**

in BRG-related closed business in 2021



## African American BRG

CA, MI, TX

## Hispanic BRG

CA, MI, TX

## LGBTA BRG

CA, MI

## Asian Indian BRG

MI

## Women's BRG

CA, MI, TX

## Asian Pacific Islander BRG

CA, MI, TX<sup>8</sup>

## South Asian Indian BRG

CA, TX

## Middle Eastern BRG

CA, MI

## Military & Veterans BRG

MI

<sup>8</sup> For the California market, the Asian Pacific Islander and South Asian Indian groups are combined as one BRG.

# Volunteerism and Philanthropy

## Volunteerism

We partner with nonprofit and community organizations to improve financial education, as well as support other community needs. The financial commitments made to strengthen local communities in 2021 were matched by the efforts of our colleagues, who devoted their time and expertise to support local nonprofits. Our colleague volunteer programs help drive Comerica's success in improving the lives of individuals, groups and communities where we do business by building and managing relationships and strategic partnerships. Our colleagues give their time and talent generously by participating on boards, conducting financial education training and providing services requested by local community groups, all helping to improve the communities we serve.

## Volunteering Goals

Colleague volunteer activities in each primary market are overseen by a Local Community Involvement Coordinator, who works with our Senior Diversity and Inclusion Consultant–Social Impact Practices Leader to ensure that volunteering goals are met and that we follow best practices in delivering on our commitments. In each of our markets, we usually set annual goals for volunteer hours. However, as in-person volunteering was limited for most of 2021 due to the COVID-19 pandemic, we chose to not set goals. In spite of this, Comerica colleagues continued to volunteer where they could. Virtual volunteer activities allowed us to support our communities throughout the pandemic.

Our colleagues' spirit to serve shined brightly in 2021, leading to more than 64,800 volunteer hours by 2,834 colleagues, translating to more than \$1.8 million worth of donated time. To build on this enthusiasm, we announced eight hours per colleague of paid time off for community volunteer work in 2022, amplifying our support for their efforts. Additionally, all part-time colleagues will be granted up to four hours of paid time off annually to participate in volunteer events. This includes volunteer opportunities related and/or unrelated to Comerica.

We believe that colleagues at all levels of our organization gain valuable and relevant community insight through volunteer activities. We ask that our senior officers complete at least three hours of CRA-qualified volunteer hours as part of their annual performance plans.

## Supporting the Communities We Serve

### 2021 VOLUNTEER HOURS BY PRIMARY MARKET

MARKET	TOTAL HOURS
Arizona	301 hours
California	6,572 hours
Florida	2,203 hours
Michigan	40,519 hours
Texas	14,376 hours
Other Markets	843 hours

More than  
**64,800**  
 volunteer hours  
 across all markets in 2021

More than  
**\$1.8M**  
 worth of donated time

## Volunteer Activities: Comerica Cares

In early 2021, in-person events were not taking place due to the pandemic. For Comerica to continue its commitment to the community through volunteerism, we had to adapt to the environment. Comerica team members spent time volunteering virtually, from remote reading to students during Black History Month to participating, with some adjustments, in food drives, personal hygiene supply drives and PPE drives.

In addition to the more than 64,000 hours our colleagues volunteered at local nonprofits, they also donated time to many of our community-focused programs, including Business \$ense Bootcamps and Comerica \$ense financial education programs. Many of these Comerica programs involved close coordination with local nonprofit partners.

**5,000**

Turkeys given out while distributing thousands of meals to those in need in Michigan

**300**

Personal care kits packed for Michigan high schoolers

### Michigan Market: A Sample of 2021 Volunteer Activities

- Packaged and donated more than 300 at-home school kits to Detroit Public Schools in partnership with United Way and the Detroit Lions
- Packed meals at Focus:HOPE distribution centers, Gleaners Food Bank, Forgotten Harvest and Capuchin Soup Kitchen
- Participated in Comerica's National Day of Service Run United Virtual Marathon to raise funds for laptops and other technology for local students
- Distributed turkeys, food and meals at the Tarence Wheeler Foundation's Annual All-Star Giveback, Arab American and Chaldean Council's Giving Thanks Celebration, Capuchin Soup Kitchen Thanksgiving Food Drive and Take My Hand Let's Give Thanks Turkey Giveaway
- Packed lunches for families residing at the Detroit Ronald McDonald House

## Philanthropy

Our vision of successful customers, colleagues and communities along with our Core Values of Collaboration and Involvement shape our approach to giving and focus our investments. By using our dollars to address social, economic and environmental challenges in the places we work, we hope to drive positive change and long-term, sustainable value for our company, stakeholders and communities.

### Comerica Giving Priorities

**Education:** Provide support to programs that provide financial, business-focused and STEM-related education support for LMI individuals and families as well as college scholarships for studies in business, finance and STEM fields.

**Economic/Community Development:** Provide support to programs that promote and enhance opportunities for LMI families and communities through economic self-sufficiency; job creation, training, readiness and retention; neighborhood/community revitalization and business development; small business training and development; and affordable housing advocacy and development.

**Human services:** Provide support to programs that enhance and protect the health and well-being of LMI individuals and families, including transitional and supportive services and housing, hunger alleviation and food access.

### HOW COMERICA GIVES



Comerica Charitable Foundation



Comerica Bank



Colleague Giving Programs/Fundraisers

In 2021, the Comerica Charitable Foundation committed \$3.6 million in grants, and our Comerica Bank committed \$4.6 million in grants and charitable contributions for educating LMI individuals and families; providing economic/ community development support for programs that promote and enhance opportunities for LMI families and communities and human services programs that enhance and protect the health and well-being of LMI individuals and families.

In 2021, Comerica colleagues committed nearly \$1.7 million to the United Way and also conducted fundraisers that raised another \$53,718 for the organization.

**In 2021, Comerica Bank and the Comerica Charitable Foundation contributed over \$8 million to support business needs and community service organizations.**



Based upon the nature of the charitable request, support is either provided through Comerica Bank's Corporate Contributions Department or the Comerica Charitable Foundation. The Comerica Charitable Foundation, which accepts program-related grant proposals online by invitation only, has four grant seasons during which charitable organizations may request support. The Comerica Bank Corporate Contributions Department provides grant funding as well as support to charitable organizations through event sponsorship within our key market areas. The Comerica Bank Corporate Contributions Department accepts online charitable sponsorship requests year-round.

### Support for National College Resources Foundation (NCRF)

Comerica Bank and Comerica Charitable Foundation together invested \$200,000 in the NCRF, which addressed COVID-19 relief, the digital divide and educational learning gaps in 2021. This Comerica COVID-19 Relief Fund managed by NCRF:

- Enhanced NCRF's efforts to assist with food insecurities, shelter, essential bills, computers, computer parts, and Wi-Fi.
- Provided funding administered to 18 universities within California, Florida, Michigan and Texas.
- Supported student retention at eight historically black colleges and universities (HBCUs).
- Directly supported 85 students, including homeless and foster care youth.
- Helped to increase achievement rates of minority students in kindergarten through 12<sup>th</sup> grade by supporting programs that improved student grades and graduation rates and built student self-esteem and academic self-efficacy through intervention, mentoring and tutoring.

Comerica Bank and NCRF partnered to bring the inaugural Detroit Empowerment Weekend in May 2021, including a S.T.E.A.M. Expo, a Latino College Expo and a Black College Expo. The three-day virtual series, free of charge, presented opportunities for high school students to have their college application fees waived, including chances to earn acceptance and receive scholarships to colleges on the spot. 1,500 people attended, including 100 students that were admitted into college during the event, and \$1.3 million in scholarships and grants given in Michigan.

Comerica Bank and the Comerica Charitable Foundation have an [Anti-Discrimination Charitable Giving Policy](#). For more information, visit [Comerica Charitable Giving](#) on Comerica.com.

To amplify our giving priority to assist LMI individuals and families, we have established strong partnerships with charitable 501(c)(3) organizations within our markets through financial, in-kind and volunteer support, and regularly look to them for opportunities where we may assist.

We support charitable organizations in our primary market areas of Arizona, California, Florida, Michigan and Texas. Requests received from organizations in these areas are reviewed to determine if the goals and/or programs for which support is being requested are in alignment with one or more of our giving priorities.

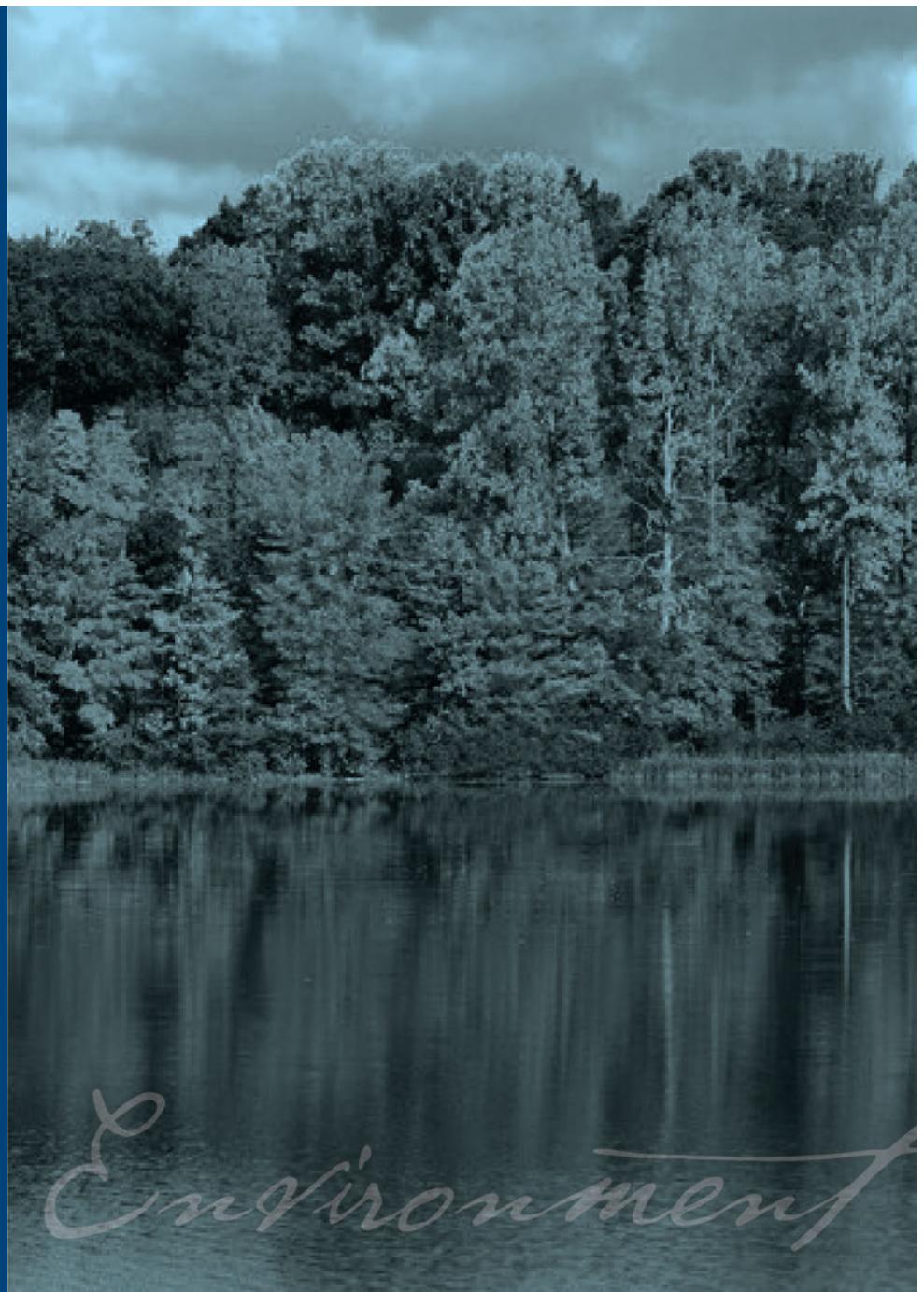
We also support market-specific fundraisers involving and chaired by colleagues. In Michigan, 2021 fundraisers included the American Heart Association Metro Detroit Heart and Stroke Walk/Run, the United Negro College Fund Detroit Walk for Education, the American Cancer Society Making Strides Against Breast Cancer/Real Men Wear Pink and Game on Cancer, Second Harvest, March of Dimes and AbilityFirst.

# Environment

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# Environment

## Climate Change Impacts

**Comerica's ESG Platform includes a commitment to address climate change because we understand that a changing climate is increasingly creating conditions that have impacts on our organization and our customers.**

We are committed to reducing our own environmental footprint and were one of the first U.S. regional banks to have pledged to become operationally net zero<sup>9</sup>. Comerica also recognizes the impact we have through our customer relationships. Based on the nature of our business and our strong history of relationship banking, we believe the best way to meet the needs of a greening economy is to work with our customers. Comerica is committed to working with our customers and helping them adapt to a changing business and planetary climate in support of their own sustainability goals, all while supporting the communities in which we do business and helping them become more resilient and sustainable.

### SUSTAINABILITY VIDEO: INHERITANCE



[\*\*CLICK HERE TO WATCH VIDEO\*\*](#)

“Long-term issues, like climate change, require long-term commitments. Our tenure in the sustainability space has allowed Comerica to make significant reductions in our environmental footprint since the launch of our sustainability office in 2008. We see our role evolving to include enhancing our approach to climate risk and supporting our customers on a transition to a greener economy.”

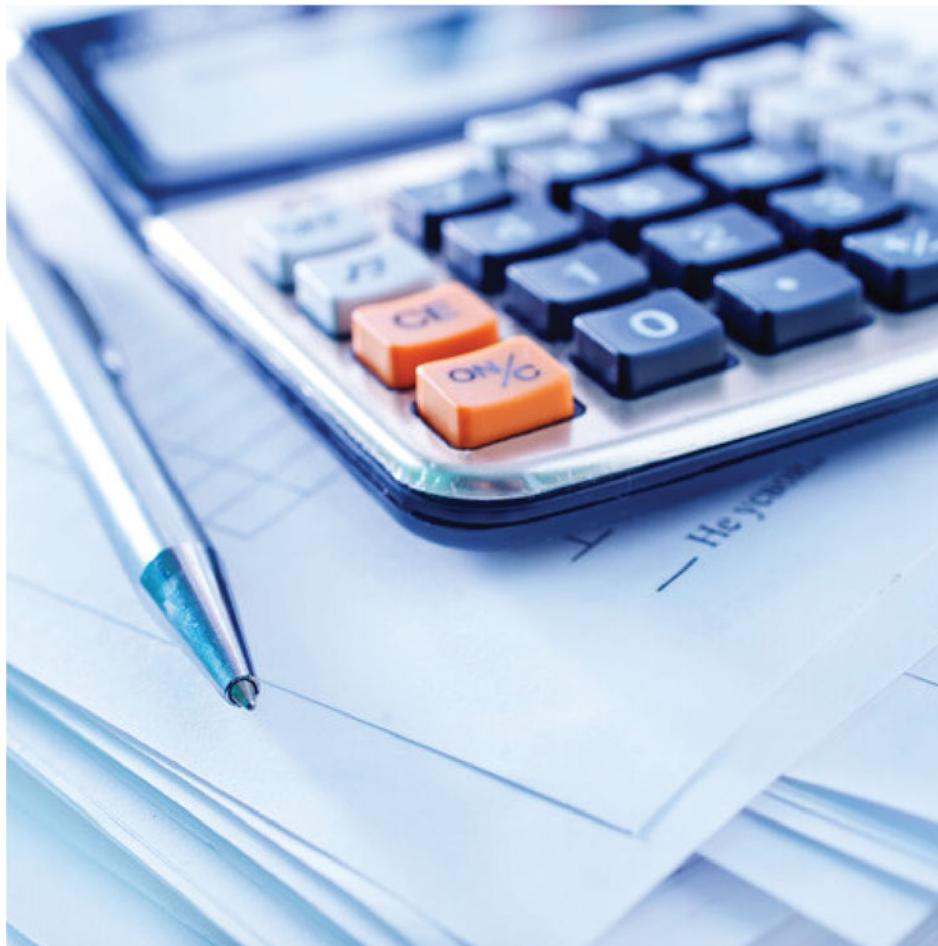
**Scott Beckerman**

Senior Vice President, Director of Corporate Sustainability

**Comerica has a long-standing Environmental Policy Statement that includes the following commitments:**

- Measure, report and seek to reduce our greenhouse gas (GHG) emissions
- Evaluate whether climate change risks may result in incremental credit risk in various portions of our loan portfolio as a consequence of the exposure of certain industry sectors or borrowers to the likely legal/regulatory, economic or physical impacts of climate change, and if necessary, develop appropriate strategies and tools to manage such risks
- Help our customers and suppliers increase their awareness of both risks and opportunities associated with climate change developments
- Work to increase our colleagues' awareness of climate change issues and the steps they can take to mitigate or adapt to the effects of climate change in their own homes and communities
- Seek profitable opportunities to provide financial products and services that assist our customers to more effectively manage their own impacts on climate change and the global environment
- Support public policy approaches to the management of climate change risks that harness the power of markets to create and implement cost-effective solutions

<sup>9</sup> When Comerica's 2050 operational emissions reduction goal was initially set, it was to become operationally net zero related to our Scope 1 and 2 real estate-related greenhouse gas emissions, which covered 99% of our Scope 1 and 2 GHG emissions. In 2021, we extended our goal to include our Scope 1 travel GHG emissions so that it includes all Scope 1 and 2 GHG emissions.



## CDP Participation

Since 2009, Comerica has participated in the public disclosure of environmental information through CDP (formerly the Carbon Disclosure Project). As a global nonprofit organization committed to compiling and comparing comprehensive datasets on corporate and city actions to affect change in their impacts to the environment, CDP provides an objective means for us to track our progress. In 2020, we received an A- from CDP and in 2021, we received a B score on our CDP Climate Change Questionnaire Response. A copy of our [most recent CDP response](#) is available at [Comerica.com/sustainability](https://Comerica.com/sustainability).

To understand more about Comerica's climate change strategy, efforts and progress, review our forthcoming 2021 Task Force on Climate-Related Financial Disclosures (TCFD) report, which we expect to publish in 2022. In advance of the publication of the TCFD report, we have developed a [TCFD Index](#) contained in this report.

### An Industry-wide Effort: Partnership for Carbon Accounting Financials

In late 2020, Comerica joined the Partnership for Carbon Accounting Financials (PCAF), a financial services industry-led partnership of more than 250 global financial institutions working to facilitate a consistent and transparent approach and framework to assess and disclose GHG emissions associated with loans and investments. In joining PCAF, we signed a [commitment letter](#) to support the development of, and to begin reporting on our finance-related greenhouse gas emissions within three years. We are on track to share our first financed emissions disclosure in 2023. Comerica also co-chairs the external PCAF business loans workgroup.

# Environmental Risk Management

Our efforts to identify, assess and respond to climate-related risks and opportunities are led by our Director of Corporate Sustainability. These efforts are undertaken on an ongoing basis throughout the year and consider short-, medium- and long-term time horizons. As chair of our Sustainability Council, and in consultation with the Board's ERC, the ERRC and other applicable business units and cross-functional teams focused on particular elements of climate-related issues, the Director of Corporate Sustainability identifies and assesses climate-related risks and opportunities for the organization. These risks include the environmental impact associated with our own operations as well as those of our customers and suppliers.

We evaluate operational environmental risk in terms of transitional and physical risks across a variety of issues. An example involving transitional risk is our effort to reduce our own energy consumption and associated greenhouse gas emissions. By reducing our energy consumption, we reduce our vulnerability to potential climate-induced price fluctuations and shocks. We also evaluate physical risks in terms of our own operations and assess and modify our approaches as necessary.

## Reducing Environmental Risk Through Credit and Lending Practices

### Financial Solutions for Climate-Friendly and Higher-Risk Companies

Our credit and lending decisions and relationships are guided by our corporate credit policies and evaluated on the individual details of each borrower and transaction. In addition, we pursue certain lines of businesses and industries based on our ability to provide products and services using our specialized expertise. An example of this is our Environmental Services Group, which provides financial solutions to a range of companies, including those in the landfill, gas to energy, waste to energy, renewable energy and recycling businesses, that help reduce the physical risks of climate change. We have also implemented policies that require significantly increased rigor and due diligence when we consider financing within certain industries or to higher risk customers.

## Real Estate Lending Practices

Our Environmental Risk Management (ERM) Group, within our Enterprise Risk Division (ERD), manages environmental risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate and minimize potential environmental risks associated with loans secured by real estate. Managing these environmental risks helps to limit the economic, regulatory and reputational risks associated with taking real estate as collateral in a loan transaction. Our Environmental Liability Policy requires properties that are pledged as collateral to be evaluated for potential environmental liabilities of significance using standard and proprietary due diligence tools. In this way, Comerica supports the cleanup and reuse of industrial and commercial properties that have underlying soil and groundwater contamination.

Comerica follows Federal Reserve System and Federal Deposit Insurance Corporation guidelines that require lending institutions to have policies and procedures in place to manage environmental risk. We require our customers to comply with environmental laws that are covered in our lending agreements and monitor for environmental compliance when loans are originated and, depending on the individual credit risk profile, when certain loans are renewed. In some cases, we require follow-up assessments with borrowers and create agreements with them that establish specific outcomes and deadlines.



# Managing Supplier Sustainability Risk

As stated in **Comerica's Environmental Policy Statement**, we expect our suppliers to manage resources wisely. During the supplier sourcing process, Comerica's Sustainability Office reviews products and services requested to determine potential sustainability risks or opportunities. When found, the Sustainability Office reaches out to the sourcing lead to share recommendations, including requesting sustainable attributes of products purchased or additional supplier information to determine if mitigation of risks are necessary. In 2021, we reviewed 155 sourcing projects associated with more than 280 different suppliers.

From 2011 to 2020, Comerica assessed how our supply chain partners were working to support sustainability within their own organizations and determine their approach to reducing their environmental impacts. To do this, we used an Environmental Sustainability Questionnaire to collect information about climate change, carbon emissions and sustainability policies and performance. We tracked the percentage of procurement spend with suppliers that fell into our acceptable scoring range of A, B, or C during our 3-year scoring rounds (3 rounds completed). This scoring was done on our top 30% of spend within the reporting year.

In 2021, we decided to take a different approach and viewed our top 85% of suppliers based on spend to find industries with potential higher carbon risks. We reviewed our suppliers' associated emission factor intensity by using their primary North American Industry Classification System (NAICS) codes and the U.S. Environmental Protection Agency (EPA) Supply Chain Greenhouse Gas Emission Factors for U.S. Industries and Commodities (2020) to get an understanding of Comerica suppliers that might operate within higher carbon risk industries. We plan to use this information to better understand and manage potential climate transition risks going forward.



# Our Sustainable Operations

Our operational environmental sustainability efforts include reducing GHG emissions and efficiently using resources. Reducing energy consumption is key to minimizing our GHG emissions footprint since the majority of our direct GHG emissions are related to energy used to operate our buildings. Efficiently managing our energy use is also important to our bottom line as energy is a significant operating expense.

## Reduction of GHG Emissions Impacts



**Goals:** To guide our environmental strategy and help us reduce Comerica's carbon footprint, we have established the following quantifiable and measurable goals.

GOALS <sup>10</sup>	PROGRESS
<b>65%</b> reduction of 2012 base year GHG emissions by 2030 (includes Scope 1 and 2 location-based emissions)	As of 2021 year end, we have achieved a <b>57%</b> reduction against our 2030 goal and have already exceeded our 2025 goal.
<b>100%</b> reduction of 2012 base year GHG emissions by 2050 (includes Scope 1 and 2 location-based emissions)	

Our Corporate Real Estate team along with their external partner manage our operational Scope 1 and 2 GHG emissions goals and energy use. Real estate-based energy consumption is our most significant contributor to our operational Scope 1 and 2 GHG emissions, accounting for approximately 99% of total Scope 1 and 2 GHG emissions. The remaining 1% comes from travel-related Scope 1 emissions.

In 2021, we took the following key actions toward achieving our goal to reduce our Scope 1 and 2 GHG emissions:

- Leveraged our smart building controls technology to capitalize on mild weather, referred to as active management
- Installed thermal management phase-changing technology above ceilings in some buildings, reducing demand for mechanical heating and cooling

For more details on our Scope 1, 2, and 3 emissions progress, review our **current GHG emissions verification declaration**, the **Environment Key Metrics** table, and our **most recent CDP Response**.

<sup>10</sup> We previously achieved our first, second, and third generation greenhouse gas reduction targets in 2013, 2016, and 2020, respectively.

## Reduction of Water, Paper and Waste Impacts



**Water Goal:** **30%** reduction in water consumption (2012-2020); achieved in 2019  
**Progress:** As of 2021 year end, we have achieved a **38%** reduction from our 2012 base year.



**Paper Goal:** **50%** reduction in office copy paper usage (2012-2020); achieved in 2019  
**Progress:** As of 2021 year end, we have achieved a **75%** reduction from our 2012 base year.



**Waste Goal:** **20%** reduction in waste to landfill (2012-2020); achieved in 2015  
**Progress:** As of 2021 year end, we have achieved an **36%** reduction from our 2012 base year.

### Water

Water stewardship is important as we operate in water-stressed regions, as well as those with an abundance of water. Our approach continues to focus on efficiently using this important resource and closely monitoring consumption and costs. Comerica's water usage is split between domestic (interior) water use and landscape irrigation activities. Our Corporate Real Estate team along with their external partner track water consumption through our metered utility bills.

In 2021, we took the following key actions to reduce water usage:

- Further restricted irrigation water use to focus on seasonal needs
- Ensured water-saving features (i.e. low-flow fixtures, smaller water heaters) are included in all new builds or significant renovations

We track our water consumption by evaluating water bills for any anomalies in consumption or spend, which may indicate leaks or theft. This consumption data is added to our energy management system, which we use to evaluate data trends quarterly. The trend data helps us understand weather-related impacts on our water consumption, impacts associated with water efficiency measures and impacts resulting from system leaks.

### Paper

Our Corporate Purchasing department tracks paper purchases across the company on a quarterly basis, including office copy paper, envelopes, rolled paper, statements, letterhead, marketing brochures and business cards. Our focus continues to be on implementing a variety of technology enhancements and educating colleagues about ways to reduce their paper consumption.

In 2021, we took the following actions to reduce paper consumption:

- Began a new sourcing project to make the remainder of our ATMs envelope-free
- Implemented a phaseout of BUNDL reports
- Continued colleague messaging to reduce paper use

The Report Distribution System (BUNDL), is a legacy reporting tool that generates paper reports for colleagues. Although scheduled to be addressed as part of Comerica's Digital Transformation, leadership expedited the elimination of paper reports by actively working with internal users and directing them to use electronic reporting alternatives. Comerica was able to turn off the majority of BUNDL reports, which resulted in the reduction of 1.6 million pages of paper printed annually and an estimated labor savings of 84 hours per year. In addition, the travel associated with delivering the reports was also reduced.

### Waste

Our Corporate Real Estate team along with their external partner track landfilled and recycled general office waste through our corporate-wide waste vendor, who provides updates/figures on an annual basis. Annual data is also gathered from our vendors who handle the recycling of electronics, paper and universal wastes.

Comerica's waste reduction improved as most employees remained working from home in 2021. As a result, employees have become accustomed to working with less paper, further decreasing our waste generation.

### 2021 WASTE AND RECYCLING METRICS

**1,486**  
**tons**

Recycled/repurposed office paper

**96**  
**tons**

Recycled/repurposed electronic equipment

**36%**

reduction in landfilled waste from 2012 through 2021

**57%**

of total waste diverted from the landfill

## Tracking Our Progress

Each quarter, a detailed report is produced to track progress across our environmental Key Performance Indicators (KPIs). This KPI report tracks utility-related water, energy usage and emissions along with data for other reported sustainability-related activities, such as corporate travel. Other KPIs, like waste consumption, are tracked on an annual basis. We analyze the results and trends from these reports and share them with key decision makers, such as our Corporate Real Estate leadership, the Corporate Sustainability Office and the Sustainability Council. We also relay relevant information and metrics to our Facilities Management and Engineering teams to keep them informed of our facilities' performances, which allows them to take action, as appropriate, to help ensure we meet our environmental sustainability goals. For more environmental metrics, view our [Environment Key Metrics tables](#).

## Driving Sustainability Engagement and Awareness

### Engaging Colleagues

We educate colleagues on sustainability through internal communications and discussion boards, our Master of Sustainability Awareness (MSA) program, green office teams, sustainability-focused work groups and training. New hires are required to complete mandatory sustainability awareness training, with 100% of Comerica's new hires completing the course in 2021.

**80%** of colleagues responded they believe Comerica is committed to environmental sustainability, based on Comerica's 2021 employee engagement survey.

### Master of Sustainability Awareness Program (MSA)

The voluntary Comerica MSA program is a cornerstone of our sustainability engagement strategy. Designed to teach colleagues about sustainability, the program provides them with ways to share their knowledge and put it into action. MSA engages in activities that support Comerica's sustainable business strategy and bring sustainability to life in our colleagues' everyday activities at home. **As of year-end 2021, 573 Comerica colleagues were participating in the MSA program.**

### GREEN OFFICE TEAMS

Nine green office teams, made up of dedicated volunteers based at our larger office buildings, organize year-round sustainability awareness and community involvement initiatives. Events in 2021 included environmental-related volunteering projects, virtual and in-person educational events, and health and wellness sessions.

### Comerica and Community Impact

Comerica also expanded CoWork, a corporate real estate initiative to help us reduce square footage and environmental impacts while benefiting local nonprofits and community organizations. CoWork projects also include the incorporation of more ergonomic features, updated computers and other wellness and environmentally beneficial technology. Five additional offices received CoWork consolidation in 2021 for a total of 22 completed locations since September 2015.

**What this meant in 2021:** CoWork provided Comerica with creative opportunities to reuse, repurpose and recycle surplus furniture, artwork, office supplies, carpeting, tile and other construction materials — reducing our total waste to landfills, resulting in:

- Four community nonprofit organizations engaged
- More than 30 pieces of furniture and other items donated
- Office supplies and artwork donated to schools, churches and nonprofits
- 38.26 U.S. tons of construction materials recycled
- 10.253 U.S. tons of paper shredded and recycled as part of CoWork renovations

Our CoWork spaces included features such as low volatile organic compound carpets, glue, paint, stain and millwork; LED lighting with energy reduction features; GreenGuard Certified products to reduce indoor chemical air emissions; hydration stations to reduce bottled water use; and solar shades to improve temperature control and colleague comfort.

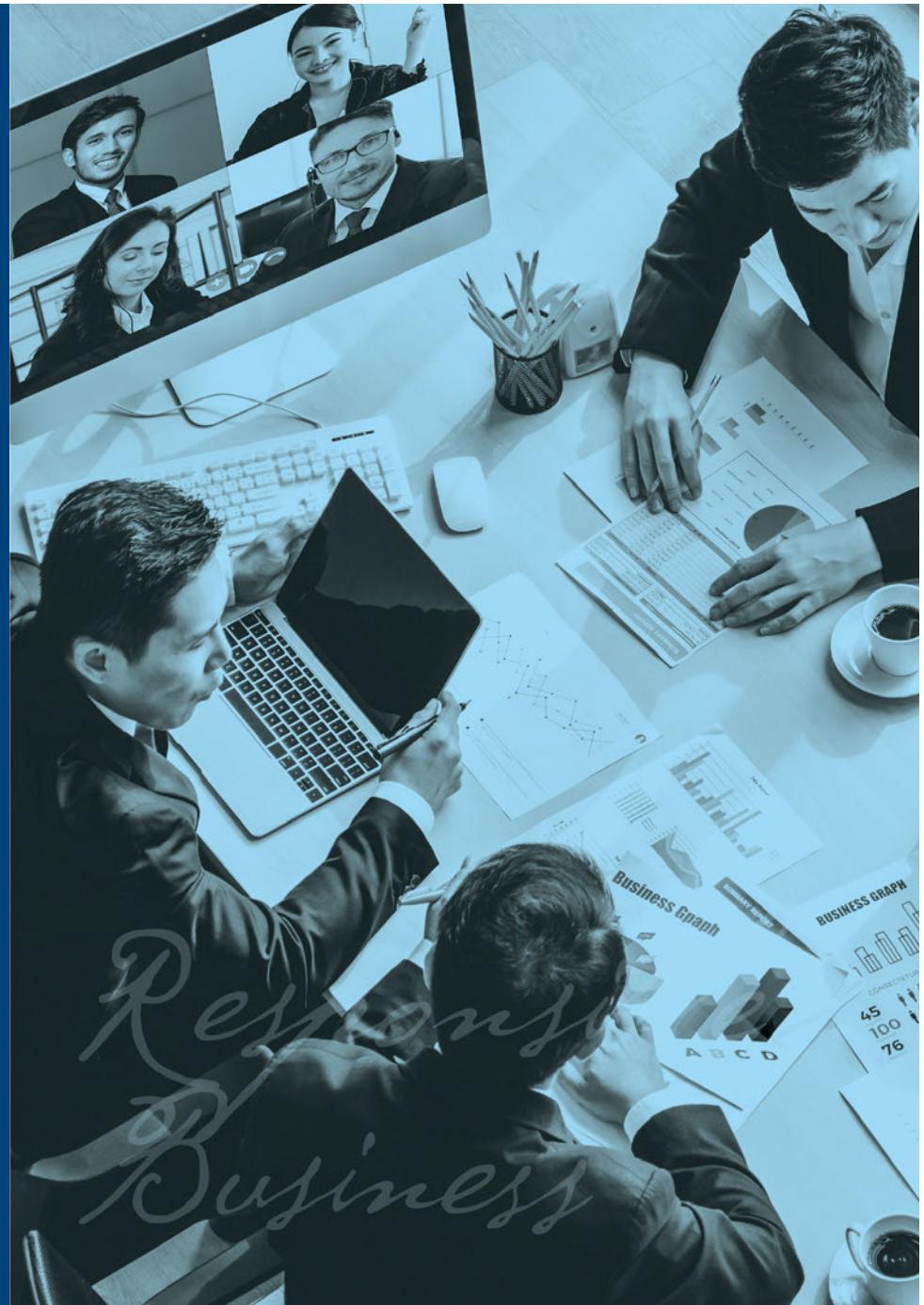


# Responsible Business

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# Responsible Business

## Reputation and Transparency

Our business is based on the trust of our customers, communities and entire value chain, and we are committed to earning and maintaining that trust through ethical operations and doing business the right way—with honesty, integrity and transparency. This commitment to responsible business is reflective of our Core Values, is embedded in our culture, and forms the foundation for the way we operate on a daily basis.

Beginning in 1849, Comerica has stood as a beacon of strength in the communities we serve, earning the trust and confidence of our colleagues, customers and stakeholders. Since then, we have worked to protect and enhance our brand and reputation as a leader in our industry, delivering a premium blend of service and value while ensuring transparency in our disclosures and reporting, as well as in the many other ways we interact with colleagues, customers, investors and other stakeholders. Increasingly, customers are interested in doing business with companies they admire and trust. By living our **Core Values**, we put ourselves in the best position to maintain our strong reputation as an admired and trusted organization within the financial services industry and in the markets we serve.

Transparency is one of the most significant topics for our stakeholders and, as a result, one of our Impact Topics. As a leader in the financial services industry, we understand the importance of sound, verifiable data and visibility into our methods of disclosure. We provide robust financial, environmental and social reporting, using well-understood metrics to demonstrate our performance, progress and successes. We are committed to implementation, control and maintenance of systems and procedures to obtain and verify information we disclose, including how we track and manage our sustainability impacts, risks and opportunities.

**14<sup>th</sup>**

Consecutive corporate responsibility-related report

**13**

Consecutive years responding to CDP's annual climate change questionnaire

**9**

Consecutive years of third-party assured GHG data

## Business Risk Management

With a consistent and conservative approach to banking, effective risk management and oversight has always been a priority at Comerica. It is critical to our growth, success and organizational resilience, enabling us to respond to evolving business trends, market demands and an increasingly complex regulatory environment. It also allows us to proactively respond to external threats and events, including risks and opportunities arising from ESG issues.

We continuously strive to improve and develop our risk management and oversight. While we assume various types of risk during the normal course of business, we work to understand, manage and carefully consider the risks we are willing to take and accept. In this way, we appropriately balance revenue targets with our corporate strategy, risk appetite, mission and **Core Values**.

In 2021, we made enhancements to our risk management tools and resources, including:

- Development of a detailed listing of risk management responsibilities by line of defense and Risk Pillar
- Updates to our compliance management risk assessment process to drive greater transparency into our compliance risk profile
- Streamlining of our third party risk management processes to support stronger vendor oversight
- Automation of various control processes to improve efficiency and reduce error rates
- Initiated a process to begin the inclusion of climate-related risks into our existing taxonomy



## Risk Management Oversight

Our governance structure is a multi-layered approach that fully supports our enterprise risk management framework. This framework provides guiding principles and recommended practices to ensure a consistent, holistic approach to Risk Management. It is comprised of a governance structure overseen by the Board of Directors, who approve Comerica's Risk Appetite Statement, and outlines key risk management components, including the risk taxonomy, risk assessments, risk policies and the Three Lines of Defense (Business Units, Enterprise Risk Division and Internal Audit).

### BOARD RISK OVERSIGHT AND THE THREE LINES OF DEFENSE

Comerica Board of Directors				
Audit Committee	Enterprise Risk Committee			
Internal Risk Management Committees				
Three Lines of Defense				
<b>First Line of Defense</b>	All Comerica Colleagues	Responsible for identification and ownership of risks and implementation of appropriate controls to mitigate risks to within the risk appetite.		
<b>Second Line of Defense</b>	Enterprise Risk	Providing independent risk oversight and guidance to the First Line of Defense to ensure risks are appropriately mitigated within the risk appetite		
<b>Third Line of Defense</b>	Internal Audit	Providing independent assurance that appropriate controls are in place and operating effectively in first and second lines of defense		

Every individual at Comerica plays a role in managing risk to help achieve our strategic goals on the [Comerica Promise](#). Our colleagues within the first line of defense are responsible for the day-to-day management and ownership of risks. Each of the major risk categories are further monitored and measured by specialized risk managers in our Enterprise Risk Division. This second line of defense is led by the Chief Risk Officer and provides consistent processes for how our business units identify, measure and manage existing and emerging risks, ensuring alignment of risk practices across the company.

Risk management committees, chaired by various members of Executive Management with risk subject matter expertise, serve as a point of review and escalation for those risks which may have material impacts, risk interdependencies or where risk levels may be nearing the limits outlined in the Comerica Risk Appetite Statement. These committees are comprised of senior level leaders who represent views from both the lines of business and risk management. Internal Audit, the third line of defense, monitors and assesses the overall effectiveness of the risk management framework on an ongoing basis and provides an independent, objective assessment of the Corporation's ability to manage and control risk to management and the Audit Committee of the Board. The Board's Enterprise Risk Committee meets quarterly and is chartered to assist the Board in promoting the best interests of the Corporation by overseeing policies and risk practices relating to enterprise-wide risk and ensuring compliance with bank regulatory obligations.

The overall effectiveness of our risk management framework is regularly reviewed through internal and external audits, examinations by federal and state regulators, self-assessments and benchmarking. We conduct a myriad of risk assessment exercises across the organization, including regular stress-testing and scenario assessment processes for significant identified risks to our company. For more on risk identification and management, see our [2021 10-K](#).

### SUPPLIER RISK MANAGEMENT

Our risk management framework also extends to those who do business with us. We conduct initial and ongoing risk evaluations of our suppliers and perform due diligence reviews of potential suppliers based upon the scope of services to be provided and the potential risk to our organization. Click [here](#) to learn more about how we effectively manage supplier risk.

## Key Enterprise Risks

Risks we manage through our Enterprise Risk Management Framework include:

<h3>Comerica's Enterprise Risk Pillars</h3>	 <p><b>STRATEGIC</b> Risk of inadequate income/returns or loss due to impairment of reputation or failure to develop or execute business plans, assess opportunities or identify appropriate compensation levels</p>	 <p><b>COMPLIANCE</b> Risk of regulatory or legal sanctions or loss from failing to comply with applicable laws, regulations and other banking standards</p>
 <p><b>MARKET</b> Risk of financial loss due to adverse price movements, resulting from fluctuations in interest rates, foreign exchange rates and commodity and equity prices</p>	 <p><b>CREDIT</b> Risk of loss due to the failure of a customer or counterparty to meet the terms of lending/funding related contracts or from a lack of diversification</p>	 <p><b>TECHNOLOGY</b> Risk of loss or adverse outcomes arising from the people, processes, applications and infrastructure that support the technology environment</p>
 <p><b>LIQUIDITY</b> Risk that Comerica does not have sufficient access to fundings or the ability to raise or borrow fundings to maintain normal operations</p>	 <p><b>OPERATIONAL</b> Risk of loss due to failed internal processes and people, or from external events, excluding those driven by technology</p>	

## Business Continuity

Effective business continuity and recovery management preparedness is a crucial part of how Comerica proactively addresses potential risks to the business. From monitoring our systems for internal and external threats to monitoring Comerica locations for natural disaster or pandemic events, we strive to ensure the continuity of critical products and services provided to our customers as well as the safety and well-being of our customers and colleagues. We also recognize the impact of climate change and the potential for increased frequency and severity of storms and other natural disasters, further elevating the importance of our business continuity practices.

Our Business Continuity Management (BCM) program enables Comerica management to oversee and implement resilience, continuity and response capabilities to safeguard employees, customers and our products and services in the event of a disruption to regular operations. Our overall objective is to support operations at an acceptable level and recover within an acceptable timeframe. Therefore, we develop, maintain and regularly test our enterprise-wide continuity and disaster recovery plans that consider all critical elements of our entire business. We prioritize business objectives and operations that are essential for recovery and ensure our disaster recovery planning prepares for the recovery or continuation of technology systems and assets, infrastructure and applications that are critical to our business functions.

In 2021, the ongoing global pandemic continued to test our abilities to execute on our business continuity plans, with more than 60% of the company working remotely. Learnings were used to develop an enhanced Pandemic Plan. We also conducted additional testing of our Business Continuity Plans, using technology-related scenarios to help us further refine our approach.

Business Continuity Executive Team		
National Business Continuity Planning Team		
Incident Support Team California	Incident Support Team Michigan	Incident Support Team Texas, Florida, Arizona
Business Unit Recovery Teams	Business Unit Recovery Teams	Business Unit Recovery Teams

# Compliance and Ethics

As one of the leading financial institutions in the U.S., we are committed to earning the trust and confidence of our customers, colleagues and stakeholders. We do this by demonstrating the highest standards of ethics and integrity in everything we do. This commitment is founded in our Core Values and embedded in our culture. We provide our colleagues, senior leaders and Board of Directors with tools and knowledge to take ownership of this commitment and to act with integrity and in compliance with all ethical and legal responsibilities.

We also require that all suppliers (and/or third parties acting as agents of Comerica) conduct themselves with the same high standards of honesty, fairness and integrity. Suppliers must abide by all applicable federal, state and local laws, rules and regulations while assuring that all services are conducted with a high degree of professionalism and in accordance with the terms and conditions of the relationship. Additional information on supplier requirements can be found on [Comerica.com](https://www.comerica.com).

Our ethical values are underscored in our Code of Business Conduct and Ethics for Employees and guide our treatment of customers, colleagues, business partners and the communities we serve. Senior financial officers are subject to an additional Code of Ethics, and the Board of Directors is subject to a Directors' Code of Conduct.

**Code of Business Conduct and Ethics for Employees:** A key tool for instilling an ethical culture at Comerica, it also helps ensure compliance with related laws and regulations. The Code supports the Comerica Promise and provides guidance on issues including ethical business practices, bribery, corruption, fair dealing, maintaining professional relationships, avoiding conflicts of interest and reporting illegal or unethical behavior.

**Senior Financial Officer Code of Ethics:** While all colleagues, including Comerica leaders, are bound by the Code of Business Conduct and Ethics for Employees, senior financial officers and the Chairman, President and CEO must also adhere to the Senior Financial Officer Code of Ethics. The honesty, integrity and sound judgment of the Chairman, President and CEO and senior financial officers is fundamental to our reputation and success, and this Code highlights additional requirements and responsibilities.

**Code of Business Conduct and Ethics for Members of the Board of Directors:** 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. While Board members must also adhere to the Code of Business Conduct and Ethics for Employees and the Senior Financial Officer Code of Ethics, this Code provides the Board with guidance on recognizing and handling ethical issues, sets expectations regarding a variety of situations and provides information on how to manage unethical conduct.

We are not aware of any incidents of non-compliance related to fair lending, anti-discriminatory regulations, anti-competitive behavior or anti-trust or monopoly practices occurring in 2021 that would have a material adverse effect on our operations or ability to perform the services we offer.

## Communication and Training

We use a variety of communication channels, including mandatory annual online training and our intranet site, to emphasize personal accountability in complying with our Code of Business Conduct and Ethics for Employees provisions and to remind colleagues of the importance of reporting inappropriate and/or illegal conduct. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees. In 2021, 99.9% of active colleagues completed mandatory Code of Business Conduct and Ethics training. For 2021 compliance training metrics, review our [Responsible Business Key Metrics table](#).

In addition to voluntary learning, Comerica colleagues complete a variety of mandatory training courses on topics that include ethics, regulatory issues, human rights, privacy and protection, anti-money laundering and diversity, as well as a one-time sustainability training course for new hires.



## Reporting and No Retaliation Policy

At Comerica, we foster a culture where colleagues are encouraged to speak up and raise questions and concerns without fear of retaliation, with our non-retaliation statement included in our Code of Business Conduct and Ethics for Employees. We provide several channels for reporting violations of laws, rules and regulations that apply to our business, in addition to violations of our Code of Business Conduct and Ethics for Employees and other Comerica policies. Comerica maintains two hotlines for colleagues that provide a confidential reporting process through a third-party vendor. Calls to these hotlines can be made anonymously. In 2021, 55 concerns were recorded via the hotline, with 18 from Q4 2021 pending resolution at year-end 2021.

## Anti-Money Laundering Compliance

The Comerica Anti-Money Laundering (AML) Compliance program covers Comerica Bank and all of its subsidiaries. We strictly comply with all Bank Secrecy Act (BSA) and USA PATRIOT Act requirements. In accordance with these requirements, we have the following people, policies and procedures in place as part of our AML Compliance program:

- A designated BSA/AML Compliance Officer
- Policies, procedures and controls designed to guard against money laundering
- Ongoing compliance training
- Independent auditing of the program

Our AML Compliance program deploys systems to monitor customer and business unit risks and implements additional controls and/or quality assurance reviews when specific risks are identified. Our policies are periodically reviewed, updated and approved by our Board of Directors and are independently tested on a yearly basis by Internal Audit and outside regulatory agencies. We use the results to assess the effectiveness of and to help enhance our compliance program.

Our robust Customer Identification program is a core element of our AML program and fulfills our obligations by collecting and verifying identifying information to ensure we know who holds Comerica accounts. This information is compared to government lists of sanctioned parties and others with whom we are prohibited from doing business and helps prevent financial transactions when necessary.

For additional information, visit the [AML Compliance section](#) on our website.

### AML Training

Colleagues, when applicable, are required to complete additional annual regulatory and AML Compliance training. In 2021, 99.8% of relevant colleagues completed the AML training.



# Privacy and Information Security

Customer privacy and protection and cybersecurity are key topics critical to our business success. Our customers, colleagues and stakeholders trust us to safeguard their privacy, personal information and financial data, and we are committed to maintaining this trust. We continually evaluate and enhance our cybersecurity systems to meet our ethical, legal and regulatory obligations regarding cybersecurity and data privacy and improve our programs in these areas.

To keep abreast of the threat landscape, our information security team participates in several industry-wide initiatives and our programs aligned with industry standards such as NIST and ISO frameworks. These initiatives help keep us informed of new fraud trends and meaningful threat intelligence, enable us to develop appropriate countermeasures and provide us with the ability to share this intelligence with our colleagues, customers and community members, as appropriate. Comerica also commissions cybersecurity reviews by well-known industry professionals in addition to regular internal reviews.

Our **Security Commitment** outlines how our online banking systems use various methods, tools and processes to help keep customer accounts and information secure.

Our **Online Privacy Notice** outlines our online privacy practices and how customer information is collected.

Privacy and information protection, and related cybersecurity efforts, follow our comprehensive and frequently updated Enterprise Information Protection Framework, with responsibility for the following goals:

## Enterprise Information Protection Framework



STRATEGY AND GOVERNANCE



RISK MANAGEMENT



CONTROLS TRAINING



MONITORING AND TESTING



RESPONSE AND RECOVERY



PROGRAM MAINTENANCE

## ENTERPRISE INFORMATION PROTECTION FRAMEWORK GOALS

- 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 effectiveness of our framework, cybersecurity and privacy programs through the following initiatives:

- Risk control self-assessments conducted by our business units, including regular stress-testing and scenario assessment processes for significant identified risks to our company
- Comprehensive evaluations carried out by external regulatory examiners
- Three Lines of Defense built on internal audits, oversight and effective challenge
- A continuous monitoring program

## Oversight and Training

The Board, primarily through the Enterprise Risk Committee, oversees our risk management practices, including those related to data privacy and cybersecurity. Oversight includes overall status, effectiveness of policies and procedures, material risk issues, risk management, 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.

Our privacy and cybersecurity programs are administered by our Chief Risk Officer, Chief Information Officer, Chief Information Security Officer and Chief Technology Risk and Operational Risk Officer who all work closely with the Enterprise Risk Committee to monitor, improve and enhance the program in response to changing risk environments. Our approach to managing customer privacy has proven effective, and adjustments to our approach are made as needed in line with our overall risk management strategies.

Our colleagues are our first line of defense and play an important role in identifying and raising privacy and cybersecurity issues. We provide them with mandatory annual Information Privacy and Protection training, reviewing and updating the program each year to include relevant threats and topics. In 2021, 100% of colleagues completed the training.

# Public Policy and Government Relations

Legislation passed at the state and federal levels of government can have a big impact on our products and services. Our Government Relations Group works closely with our lines of business to monitor the development of public policies that directly affect our company and industry.

Our advocacy efforts are focused at the federal level and in our key market states. Comerica meets with elected officials and engages with national and state financial services trade associations to advocate on behalf of the regional banking industry.

Another 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. In early 2021, we made the decision to temporarily suspend contributions from our PAC as a result of political unrest following the 2020 election. We resumed contributions later in the year after putting additional criteria in place to ensure that the candidates we support are committed to working in a civil and constructive manner. 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.

Comerica is also an active member of several financial services-related trade associations across the country. Membership benefits include business opportunities for the company and effective grassroots advocacy on behalf of the industry. We monitor these organizations closely for any changes in policy positions to ensure transparency and alignment with Comerica core values. A portion of the trade associations' dues that Comerica pays are used for lobbying and/or political activities and are non-deductible under Section 162(e)(1) of the Internal Revenue Code.

**\$58K**

Comerica PAC contributions to political candidates and committees (November 1, 2020 to October 31, 2021)



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# Key Metrics Tables

OUR COMPANY	2019	2020	2021
Gross revenue (Millions \$) <sup>11</sup>	3,349	2,912	2,967
Market capitalization at year end (Millions \$) <sup>12</sup>	10,195	7,774	11,370
Common and preferred stock dividends (Millions \$)	398	391	388
Taxes (Millions \$)	336	220	256
Employee compensation and benefits (Millions \$)	1,020	1,019	1,133
Goods and services purchased (Millions \$)	772	809	837
Total loans at year end (Millions \$)	50,369	52,291	49,285
Renewable Energy Tax Credit Investments (Millions \$)	0	21	0

<sup>11</sup> Gross revenues equal net interest income and noninterest income, which comes directly from the **2021 Comerica Annual Report (F-42)**.

<sup>12</sup> Calculated using Issued Shares Less Treasury Shares per **Comerica's 2021 Annual Report**, Consolidated Balances Sheets, multiplied by 12/31/21 closing stock price per Yahoo finance.

						2019	2020	2021
<b>CUSTOMERS</b>								
New small business loan commitments (Millions \$)						>1000	810	1,013
SBA lending, including 7a and 504 loans (Millions \$)						128	123	204
<b>Privacy &amp; Protection</b>								
Number of substantiated complaints received concerning breaches of customer privacy- complaints received from outside parties and substantiated by the organization						2	1	6
Total number of identified leaks, thefts or losses of customer data						55	52	63
<b>Innovation &amp; Technology</b>								
Real Time Payments average monthly volume (% Change)						N/A	252	64
ACH average monthly volume (% Change)						N/A	9	(5)
Wire transfers average monthly volume (% Change)						N/A	17	11
Number of Mobile Banking Users (% Change)						N/A	14	7
Click & Capture Mobile Deposits (% Change)						N/A	39	13
Zelle transactions (% Change)						N/A	96	47
Web Bill payment sent electronically (% Change)						N/A	1	(7)
Checking statements sent electronically / month (% Change)						N/A	7	21
Banker Connect (video teller) machines deployed (Total number of)						54	93	117
PPP loans closed accomplished by leveraging technology (Number of)						N/A	14,735	6,292
<b>ESG-Related Lending and Investment</b>								
See <a href="#">Environmentally Beneficial Lending Metrics</a>								
See Community and Economic Development Loans and Tax Credit Investment Metrics								
See <a href="#">Total in New Account Openings from Business Resource Group (BRG) Business Referrals Metric</a>								

COLLEAGUES			2019	2020	2021
<b>Talent Attraction - Employee Demographics</b>					
Total Employees	Full-time equivalents (FTE) <sup>13</sup>		7,747	7,681	7,442
	Total number of employees <sup>14</sup>		7,948	7,870	7,611
	Full-time		7,467	7,429	7,223
	% Female		64	64	65
	% Male		36	36	35
	Part-time		481	441	388
	% Female		85	83	81
	% Male		15	17	19
Employee Breakdown by Generations	% Traditionalist (Born prior to 1946)		<0.1	0	1
	% Baby Boomer (1946-1964)		31	26	23
	% Gen X (1965-1980)		36	39	40
	% Millennial (1980-2000)		33	35	31
	% Generation Z (after 2000)		<0.1	<1	5
Employee Breakdown by Length of Service	% 0-5 Years		45	45	42
	% 6-15 Years		23	24	25
	% 16-25 Years		17	17	18
	% 26+ Years		15	15	15
Employee Breakdown by Age	Full-time	% <30 years	—	12	12
		% 30-50 years	—	48	43
		% >50 years	—	40	45
	Part-time	% <30 years	—	0	32
		% 30-50 years	—	53	31
		% >50 years	—	47	37
	Officials and Managers	% <30 years	—	16	1
		% 30-50 years	—	45	50
		% >50 years	—	39	49
	Professionals	% <30 years	—	12	11
		% 30-50 years	—	48	48
		% >50 years	—	40	41

<sup>13</sup> As reported in Comerica's 2021 Fourth Quarter Earnings release (page 8) and [Comerica's 2021 Annual Report \(Page 2\)](#).

<sup>14</sup> As reported in Comerica's 2021 10-K (page 11) combining Full-time and Part time totals.

COLLEAGUES						2019	2020	2021
<b>Talent Attraction - Employee Demographics</b>								
New Hires By Gender	Female	Number of new hires				740	524	690
		% of Total				58	61	60
	Male	Number of new hires				525	337	459
		% of Total				42	39	40
New Hires By Age	Under 30 Years Old	Number of new hires				565	389	473
		% of Total				45	45	43
	30-50 Years Old	Number of new hires				535	347	443
		% of Total				42	40	40
	Over 50 Years Old	Number of new hires				165	125	184
		% of Total				13	15	17
New Hires By Market	California	Number of new hires				271	181	166
		% of Total				21	21	14
	Florida	Number of new hires				17	7	8
		% of Total				1	1	1
	Michigan	Number of new hires				659	445	699
		% of Total				52	52	60
	Texas/Arizona	Number of new hires				317	227	285
		% of Total				25	26	25
	Other	Number of new hires				1	1	0
		% of Total				<1	<1	0
<b>Talent Development</b>								
Average hours of training per employee (mandatory and non-mandatory)						35	24	28
Percentage of colleagues who took advantage of non-mandatory, non-compliance skills training						74	96	87
Number of skills-based courses offered to Comerica colleagues						9,346	>6,900	7,635
Leadership Development Program (number of graduates) <sup>15</sup>						0	0	0
Emerging Leaders Program (number of graduates) <sup>15</sup>						44	0	0
<b>Talent Retention</b>								
Services provided through Comerica's Employee Assistance Program (# of instances)						3,054	2,892	3,700
Employees receiving tuition assistance (total number)						124	99	115
Value of tuition assistance received (\$)						444,332	418,361	465,187
Employee Awards (number of monetary awards to employees)						3,527	3,710	3,203
Value of Employee Awards (\$)						522,580	578,123	536,406

<sup>15</sup> Comerica's Leadership Development Program and Emerging Leaders Program are typically offered on an alternating bi-annual basis. In 2020, the Emerging Leaders Program was placed on hold due to the COVID-19 pandemic. The Leadership Development Program restarted in late 2021, but did not produce any additional graduates until Q1 2022.

COLLEAGUES			2019	2020	2021
<b>Talent Retention</b>					
Employee Turnover Total	Number of		1,334	938	1,453
	Percent of Total Employees		16.8	11.6	19
Employee Turnover By Gender	Female	Number of	859	600	913
		% of Total	64	64	63
Employee Turnover By Age	Male	Number of	475	338	540
		% of Total	36	36	37
Employee Turnover By Type and Market	Under 30 Years Old	Number of	368	292	469
		% of Total	28	31	32
Employee Turnover By Type and Market	30-50 Years Old	Number of	581	347	560
		% of Total	44	37	39
Employee Turnover By Type and Market	Over 50 Years Old	Number of	385	299	424
		% of Total	29	32	29
Employee Turnover By Type and Market	Voluntary	Number of	974	771	1,228
		% of Total	73	82	85
Employee Turnover By Type and Market		California %	25	20	20
		Florida %	1	2	1
Employee Turnover By Type and Market		Michigan %	47	55	52
		Texas/Arizona %	27	22	27
Employee Turnover By Type and Market	Involuntary	Number of	360	167	225
		% of Total	27	18	15
Employee Turnover By Type and Market		California %	9	19	11
		Florida %	1	0	1
Employee Turnover By Type and Market		Michigan %	60	63	69
		Texas/Arizona %	30	17	19

COLLEAGUES	2019	2020	2021
<b>Employee Engagement</b>			
Number of Diversity-Related Employee Resource Network Group (ERG) Categories			
Number of Diversity-Related ERG Chapters within our markets	7	10	10
Number of Local Diversity Awareness Roundtable Teams	13	18	19
Number of Green Office Teams	5	6	1
Number of employees participating in Financial Education Brigade	9	9	9
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program (Percent) <sup>16</sup>	183	753	845
Bronze-level certified colleagues (number of)	84	86	85
Silver-level certified colleagues (number of)	4,807	4,823	4,857
Gold-level certified colleagues (number of)	3,905	4,016	4,076
Platinum-level certified colleagues (number of)	3,190	3,318	3,412
Colleagues enrolled in Comerica's Master of Sustainability Awareness (MSA) Program (Number of) <sup>17</sup>	1,928	2,012	2,099
Seedling-level certified colleagues (number of)	482	515	573
Sapling-level certified colleagues (number of)	69	77	79
Mighty Oak-level certified colleagues (number of)	13	14	16
	5	4	4

<sup>16</sup> Master of Diversity Awareness (MDA) program level listings are cumulative. If a colleague has been certified at the highest level, employee is also counted in the lower certification levels.

<sup>17</sup> Master of Sustainability Awareness (MSA) program level listings are cumulative. If a colleague has been certified at the highest level, employee is also counted in the lower certification levels.

DIVERSITY, EQUITY & INCLUSION						2019	2020	2021
<b>Diversity, Equity &amp; Inclusion - Internal<sup>18</sup></b>								
Women employees (Percent of total employees)								
						65	65	65
Women Officials and Managers (total number)						684	688	681
Women Professionals (total number)						1,517	1,545	1,577
Women Other (Administrative Support, Sales Worker, and Service Worker) (total number)						2,954	2,844	2,633
Racial/Ethnic Minority Population employees (Percent of total employees)						40	41	41
Racial/Ethnic Minority Officials and Managers (total number)						356	375	384
Racial/Ethnic Minority Professionals (total number)						932	947	995
Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number)						1,882	1,867	1,718
For more employee diversity metrics, refer to the <a href="#">Key Metrics - Colleagues</a> .								
<b>Diversity, Equity &amp; Inclusion - External</b>								
Reaching Diverse Customers								
Number of Business Resource Groups (BRG) (total number)						19	19	19
Total in closed business from BRG business referrals (Millions \$)						>160	383	418
Supplier Diversity								
Total Diverse Supplier Spend (Millions \$)						52	42	50
Total Diverse Supplier Spend Goal (Millions \$)						47	45	37
Tier 1 Diverse Supplier Spend (Million \$)						35	33	38
Tier 2 Diverse Supplier Spend (Million \$)						17	9	12
Percent of RFPs tracked which included diverse suppliers <sup>19</sup>						56	89	98
Percent of contracts awarded to diverse suppliers for relevant RFPs <sup>20</sup>						34	35	33
<b>Board Diversity</b>								
Number of Board Directors						11	11	11
% Independent Directors						91	91	91
% Racial/Ethnic Minority Directors <sup>21</sup>						27	27	27
% Female Directors <sup>21</sup>						27	27	27
% Directors <30 years age						N/A	0	0
% Directors 30-50 years age						N/A	9	9
% Directors >50 years age						N/A	91	91

<sup>18</sup> [EEO-1 categories](#) are used for breakdown of Women and Racial/Ethnic Minority employee numbers.

<sup>19</sup> Total Diverse Supplier Spend includes Tier 1 and Tier 2 spend from reporting period of 4Q 2020 to 3Q 2021.

<sup>20</sup> Percentage of projects that included diverse suppliers that were sourced to diverse suppliers

<sup>21</sup> At year-end 2021, a racial/ethnic minority Director held a key Board leadership position (Enterprise Risk Committee chair), and two female Directors held key Board leadership positions (Independent Facilitating Director and Governance, Compensation and Nominating Committee chair)

COMMUNITY	2019	2020	2021
<b>Financial Inclusion &amp; Financial Education</b>			
Number of ATMs			
Number of U.S. banking centers (Total)	577	584	647
Comerica Secured Credit Cards (Number of) for low- and moderate-income customers <sup>22</sup>	770	823	957
Number of Access Checking Customers (low- and moderate-income) <sup>23</sup>	8,819	6,822	8,780
Access Checking Balances (low- and moderate-income customers) (Millions \$) <sup>23</sup>	28	23	44
Number of low- and moderate-income individuals reached through Comerica-sponsored financial education events with nonprofit partners	35,766	35,765	50,000
Ranking of pre-paid card issuer in the U.S.	N/A	4	3
Number of state/local government benefit card programs	N/A	57	48
<b>Community Investment &amp; Development</b>			
Community and economic development loans (Millions \$)	327	1,233	2,537
Low-income housing tax credit investment deals (Millions \$)	81	75	75
New market tax credit investment deals (Millions \$)	NA	10	10
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent)	4	5	5
Number of micro-enterprise loan funds supported	28	28	35
<b>Volunteerism &amp; Philanthropy</b>			
Charitable gifts and corporate contributions (Millions \$)	8.4	13.2	8.3
Employee United Way contributions (Millions \$)	1.7	1.6	1.7
Employee time volunteered (Hours)	71,376	39,368	64,813
Corporate-wide employee volunteer goal (Hours) <sup>24</sup>	64,000	64,000	N/A
Number of employee volunteers	2,490	1,892	2,834
Approximate worth of employee volunteer time (Millions \$)	1.8	1.0	1.8

<sup>22</sup> Tailored retail banking products within our CRA Assessment areas in Arizona, California, Florida, Michigan and Texas

<sup>23</sup> Access Checking account has no monthly fee with direct deposit.

<sup>24</sup> Comerica usually has an annual corporate-wide employee volunteer goal equivalent to approximately eight hours per employee. However, as in-person volunteering was limited for most of 2021 due to the COVID-19 pandemic, we chose to not set a 2021 volunteerism goal.

ENVIRONMENT		2012	2019	2020	2021
<b>Energy</b>					
Employee Numbers for Intensity Metrics <sup>25</sup>					
Annual Report-based employee FTEs - used for travel intensity-based metrics		9,035	7,747	7,681	7,442
Human Resources-based employee FTEs - used for real estate intensity-based metrics		N/A	7,600	7,536	7,268
Total Workers (including employees and contingent workers within our buildings, on FTE basis)- used for real estate intensity-based metrics		N/A	8,422	8,210	7,958
Energy Use (MWh)					
Total direct and indirect energy use- real estate and transport (MWh)		153,210	105,669	95,286	92,862
Total direct and indirect energy use- real estate and transport (Billion Joules)		551,556	380,407	343,029	334,284
Total direct and indirect energy use- real estate only (MWh) <sup>26</sup>		148,266	102,438	93,662	90,678
Direct energy use- fossil fuels (MWh)		30,966	27,646	24,378	23,497
Indirect energy use- purchased electricity, steam, chilled water in metered buildings (MWh)		93,779	56,960	53,689	51,495
Indirect energy use- estimated electricity use in leased (and unmetered) buildings (MWh)		28,465	13,623	12,048	12,384
Energy Intensity					
Total direct and indirect energy use- real estate (MWh) per square foot at year end		0.0267	0.0235	0.0218	0.0213
Total direct and indirect energy use- real estate (MWh) per square foot - average square feet over four quarters		N/A	0.0234	0.0216	0.0212
Total direct and indirect energy use (MWh) per full time employee (FTE)		N/A	13.90	12.64	12.78

<sup>25</sup> Our Human Resources (HR)-generated FTE number uses a slightly different calculation than the Annual Report FTE number and allows us to break down workers by individual locations. This allows for intensity metrics to be generated at the facility level. We use the HR-based FTE number for our real estate-related intensity-based metrics and Annual Report FTE for the travel-intensity metrics.

<sup>26</sup> Total direct and indirect energy use-real estate only includes Natural Gas, Diesel Fuel, Gasoline Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and/or Chilled Water.

ENVIRONMENT	2012	2019	2020	2021
<b>Climate Change and Greenhouse Gas (GHG) Emissions<sup>27</sup></b>				
Total GHG Emissions from Scopes 1 & 2 Real Estate and Scope 1 Travel (Metric tons of CO <sub>2</sub> e)				
GHG emissions- Scopes 1 and 2 Real Estate only- (Metric tons of CO <sub>2</sub> e)	81,734	42,621	38,354	35,519
Emissions intensity- real estate (metric tons of CO <sub>2</sub> e per square foot at year end) within organization	80,533	41,828	37,954	34,980
Emissions intensity- real estate (metric tons of CO <sub>2</sub> e per square foot- average square feet over four quarters) within organization	0.0145	0.0096	0.0088	0.0082
Percent Cumulative Scope 1 & 2 (location-based) GHG reduction from 2012 base year (Goal= 65 percent GHG reduction from base year by 2030)	N/A	48	53	57
GHG emissions- Scope 1 transport only	1,201	793	400	539
<b>Breakdown by Scope</b>				
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	6,304	5,401	5,273
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings	74,784	36,316	32,953	30,246
Scope 3 GHG Emissions (Metric tons of CO <sub>2</sub> e)- Supply Chain and Transport				
<b>Purchased Goods and Services</b>				
Gross (Metric tons of CO <sub>2</sub> e) <sup>28</sup>	N/A	N/A	N/A	65,115
Total lifecycle paper emissions	3,055	4,560	4,758	N/A
Life cycle emissions-office copy paper use	1,270	1,662	957	N/A
Life cycle emissions-other office paper use	1,563	2,721	3,643	N/A
Life cycle emissions-marketing paper use	222	176	159	N/A

<sup>27</sup> 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 Scope 1, Scope 2, and Scope 3 emissions, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in [Comerica's most recent CDP Response](#).

<sup>28</sup> In 2021, we changed our approach to calculating Scope 3 emissions for the categories of Purchased Goods and Services, Capital Goods and Upstream Transportation and Distribution to capture a larger portion of our supply chain within the emissions estimate. The individual goods, services and transportation-related emissions for paper, computer, carpeting, furniture, shipping and armored services are still being provided for previous year reference but have been incorporated into the total emissions estimate for 2021.

ENVIRONMENT		2012	2019	2020	2021
<b>Climate Change and Greenhouse Gas (GHG) Emissions</b>					
Total lifecycle computer emissions		520	2,816	1,265	N/A
Total lifecycle carpeting emissions		137	504	157	N/A
<b>Capital Goods</b>					
Gross (Metric tons of CO2e)		N/A	N/A	N/A	3,953
Total lifecycle furniture emissions		N/A	989	832	N/A
<b>Fuel-and-energy related activities</b>					
Electricity transmission/distribution loss emissions		N/A	1,708	1,657	1,595
<b>Upstream Transportation and Distribution</b>					
Gross (Metric tons of CO2e)		N/A	N/A	N/A	4,064
Shipping emissions		N/A	195	N/A	N/A
Armored vehicle emissions		N/A	69	463	N/A
<b>Waste Generated in Operations</b>					
Scope 3 lifecycle emissions associated with landfilled mixed solid waste		2,052	505	412	414
<b>Business Travel</b>					
Employee business travel by air and car		4,431	3,515	1,108	1,069
Emissions intensity- Employee business travel emissions (metric tons of CO2e) per full-time employee (FTE)		N/A	0.46	0.14	0.14
<b>Employee Commuting</b>					
Employee commuting emissions (Metric tons of CO2e)		N/A	25,837	12,918	14,205
<b>Downstream Leased Assets</b>					
Total Downstream Leased Assets		1,257	629	419	470
Subleased metered electricity		726	397	271	190
Subleased estimated electricity		423	12	10	4
Subleased natural gas		81	71	65	51
Subleased steam		28	0	0	0
Subleased estimated heat-natural gas		N/A	0	5	3
Subleased corporate jet emissions		N/A	149	68	222
<b>Other Downstream</b>					
CBRE Business Travel on Comerica Account		N/A	171	241	139
Comerica Leased Fleet		N/A	N/A	84	83
Real Estate Square Footage (Square feet at year end)					
Total metered and unmetered (square feet at year end)		5,545,466	4,350,468	4,305,584	4,260,643
Total subleased (square feet at year end)		137,637	63,375	62,725	47,105
Real Estate Square Footage (Average square feet over four quarters)					
Average metered and unmetered (square feet over four quarters)		N/A	4,370,816	4,332,328	4,270,844
Average subleased (square feet over four quarters)		N/A	66,099	63,178	50,811

**Environmental Resource Management****Waste**

Landfilled employee waste (short tons)	2,086	1,455	1,332	1,339
Percent Cumulative reduction from 2012 base year (Goal=20 percent Landfilled Waste Reduction by 2020)	N/A	30 %	36 %	36 %
Total recycled/re-purposed waste (short tons)	3,372	1,928	1,423	1,743
Recycled office paper	3,108	87	1,212	1,486
Recycled/repurposed electronic equipment	149	154	42	96
Recycled operational waste	110	3	157	153
Recycled cardboard bailed waste	N/A	2	1	0
Recycled pallets	N/A	10	8	6
Universal waste	3	60	3	2
Total waste diverted from landfill - including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste (Percent)	62	60	52	57

**Paper**

Total paper consumption (tons)	1,266	602	607	353
Office copy paper consumption (Tons)	560	245	140	140
Other office paper consumption (Tons)	618	336	447	210
Marketing paper consumption (Tons)	88	22	20	3
Paper Intensity metrics (pounds consumed per FTE)				
Total office paper (office copy and other office paper) consumption in pounds per FTE <sup>29</sup>	N/A	152.72	155.87	96.20
Office copy paper consumption in pounds per FTE	N/A	64	37	38
Percent Cumulative reduction from 2012 base year (Goal=50 percent Office Copy Paper Reduction by 2020)	N/A	56	75	75

<sup>29</sup> The 2020 value was updated in 2021 based on a previous calculation error.

ENVIRONMENT		2012	2019	2020	2021
<b>Environmental Attributes of Paper</b>					
Total FSC-certified office paper (Percent of total)					
		47	43	24	40
Total FSC-certified marketing paper (Percent of total)			64	100	100
Office copy paper >= 30 percent post-consumer recycled content (Percent of total office copy paper)		97	96	95	97
All other papers (excluding office copy paper) >=10 percent post-consumer recycled content (Percent of total papers except office copy paper)		14	9	5	3
Total post-consumer recycled content by weight (Percent of total paper consumption)		14	13	7	12
<b>Water Stewardship</b>					
Total water consumption (cubic meters) <sup>30</sup>		451,532	301,369	298,125	281,845
Intensity metric- Water consumption (cubic meters per Total Employee FTE)		N/A	39.65	39.56	38.78
Intensity metric- Water consumption (cubic meters per Total Worker FTE)		N/A	35.78	36.31	35.42
Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020)		N/A	33.3	34.0	37.6
<b>Environmentally-Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)</b>					
Loans and Commitments (Billions \$)		1.0	0.9	1.2	1.7
Loans and Commitments (Number of companies)		127	82	120	126
<b>Supplier Sustainability Engagement</b>					
Percentage of top spend screened every three years for environmental sustainability		30	37	39	N/A
Percent of spend dollars with suppliers screened for sustainability with a score of A through C		N/A	64	66	N/A
Percent change in average sustainability score of suppliers (Round 3 scoring vs, Round 2 scoring)		N/A	-1	-1	N/A
Percent of carpet purchases that were NSF 140 Gold rated and/or Cradle-to-Cradle silver certified		99	100	100	100
Percentage of flooring purchases, including carpet and vinyl flooring, that contained recycled content		N/A	97	86	98
Percentage of computers and displays purchased that carried an EPEAT rating		N/A	99	100	100
Percentage of furniture purchases that were BIFMA® level certified		N/A	83	94	100
Percentage of office supplies purchased from Office Depot that contained post-consumer recycled content		N/A	18	19	20
Percentage of office supplies purchased from Office Depot that were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System		57	24	24	35

<sup>30</sup> 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.

RESPONSIBLE BUSINESS	2019	2020	2021
<b>Anti-Corruption, Ethics and Countering Bribery</b>			
Number of internal incidents of alleged corrupt behavior investigated			
	241	277	242
Number of cases where allegations were substantiated and/or employee admitted involvement	103	86	75
Number of legal rulings against Comerica or its employees for corruption	0	0	0
Colleague Annual Compliance Training (percent relevant employees who completed the required course)			
Anti-Money Laundering	99.6	99.9	99.8
Comerica Code of Business Conduct and Ethics for Employees	99.9	99.9	99.9
Fair Lending Anti-Discrimination	99.8	99.8	99.9
Information Privacy and Protection	99.9	99.9	100.0
Community Reinvestment Act	99.8	99.8	99.9
Financial Exploitation of the Elderly or Dependent Adults	99.9	99.9	100.0
Workplace Harassment	99.8	99.9	100.0
Information Lifecycle Management	99.9	99.9	100.0
Diversity	99.9	100.0	100.0
Sustainability	100.0	100.0	100.0
<b>Public Policy &amp; Government Relations</b>			
Comerica PAC contributions to political candidates and committees (Thousands \$) <sup>31</sup>	135	376	58

<sup>31</sup> Comerica PAC contributions (Nov 1 previous year– Oct 31 reporting year)

# Reporting Methodology

Comerica's 2021 Corporate Responsibility Report represents our latest ESG-based report on the impacts and opportunities associated with our work in the communities we serve. We recognize the interconnected nature of ESG topics and corporate responsibility 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 and social impacts.

We use the internationally-recognized GRI Sustainability Reporting Standards to guide our reporting and track our progress. This report has been prepared in accordance with the GRI Standards: Core option and includes the General Disclosures as well as Topic-Specific Disclosures relevant to Comerica. This report is Comerica's ninth GRI-based Corporate Responsibility and Sustainability Report. It covers our ESG-related performance from January 1, 2021, to December 31, 2021 (fiscal year 2021). In some instances, data from previous years is included for comparison and in some limited instances, the report also references some projects and initiatives that stretched beyond 2021 and into 2022.

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our **2021 Comerica Incorporated Annual Report** (herein referred to as 2021 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2021. References to the "Board" refer to the Board of Directors of Comerica Incorporated.

Impact Topics referenced are those economic, environmental, social and governance topics viewed by internal and external stakeholders as the most relevant and significant to our business based on extensive engagement. This is explained in detail in Stakeholder Engagement and ESG Impact Assessment Report. We have also mapped our Impact Topic groupings to the United Nations 17 Sustainable Development Goals (SDGs) as illustrated on the **ESG Platform Alignment subsection** of this report. Note the impact topic "Financial Inclusion & Financial Literacy" was renamed after publishing of our June 2020 Update to the ESG Impact Assessment Report and is referred to in this report as "Financial Inclusion & Financial Education."

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. Similarly, we have provided an index referencing the Taskforce on Climate-related Financial Disclosure (TCFD) framework on how our existing disclosures align with their recommendations. Our **GRI Content Index**, **SASB Content Index** and **TCFD Content Index** are provided in the Additional Information section of the report.

To learn more about sustainability and corporate responsibility at Comerica, or to provide feedback on our reporting, contact Scott Beckerman, Director of Corporate Sustainability, at [jsbeckerman@comerica.com](mailto:jsbeckerman@comerica.com) or visit us at [Comerica.com/sustainability](http://Comerica.com/sustainability).

# GRI Standards Content Index

Please note: In 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 Standards define as “Material Topics.” 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 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 standards.

This report is intended to meet “Core” requirements of GRI Standards. In some instances, we have also included non-core GRI General Disclosures in this Content Index 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 topics within the Topic-Specific Disclosures, which we have determined to be “non-material” since that information may be of interest to our stakeholders. Those topic-specific disclosures which are not indicated as material and for which we do not provide significant content in this report have been omitted from this table.

GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
<b>GRI 101: Foundation- see ESG Impact Assessment</b>	
<b>General Disclosures</b>	
<b>GRI 102: Organizational Profile</b>	
102-1 Name of the organization	Comerica Inc.
102-2 Activities, brands, products, and services	<a href="#">Comerica.com, Our Company, 2021 Annual Report</a>
102-3 Location of the organization's headquarters	Comerica Corporate Headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201
102-4 Location of operations	<a href="#">Our Company, 2021 Annual Report</a>
102-5 Ownership and legal form	<a href="#">Our Company, 2021 Annual Report</a>
102-6 Markets served	<a href="#">Comerica.com, Our Company, 2021 Annual Report</a>
102-7 Scale of the organization	<a href="#">Our Company, 2021 Annual Report, Key Metrics (Colleagues)</a>
102-8 Information on employees and other workers	<a href="#">Our Company, Key Metrics (Colleagues), Key Metrics (Diversity, Equity &amp; Inclusion)</a>  The majority of work is performed by Comerica payrolled employees. Non-employee contingent workers represent 14% of our total workforce. There are no seasonal variations in employment. At Comerica, we track all contingent workers who access our systems by adding them to our human resource information system.
102-9 Supply chain	<a href="#">Supplier Diversity, Supplier Sustainability, Key Metrics (Diversity, Equity &amp; Inclusion)</a>  At Comerica, we engage with our supply chain and appropriately manage the risks and opportunities it presents. We endeavor to broaden our positive impacts on the environment and communities by influencing our suppliers and promoting a sustainable supply chain. We consider both supplier diversity and the environmental sustainability practices of suppliers during our rigorous sourcing process for selection and regular evaluation. We look to source suppliers and services that meet our environmental criteria where possible. In 2021, Comerica had over 3,000 active suppliers and an annual supplier spend of over \$560 million dollars, 73% of which is with our top 100 active suppliers. 50% of our supply base (by number of suppliers) and 32% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,056 suppliers in Michigan and 589 suppliers in Texas. Comerica primarily does business in the United States and has no significant presence or investment in countries where there is a known lack of human rights protection. Accordingly, we do not screen suppliers or investments specifically for human rights issues at this time.
102-10 Significant changes to the organization's size, structure, ownership, or supply chain	<a href="#">2021 Annual Report</a>

GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
102-11 Precautionary Principle or approach	<a href="#">Comerica's 2021 10-K</a> (Item 1-A Risk Factors)
102-12 External initiatives	In 2020, Comerica signed the Partnership for Carbon Accounting Financials (PCAF) commitment to support the development of and to begin to report on our finance-related greenhouse gas emissions within three years. PCAF Commitment Letter
102-13 Membership of associations	<a href="#">Political Activities and Contributions, Supplier Diversity Program, Most Recent CDP Response, Diversity, Equity &amp; Inclusion, Community Reinvestment Act page on Comerica.com</a>
<b>Strategy</b>	
102-14 Statement from senior decision-maker	<a href="#">Message from our Chairman, President and CEO</a>
102-15 Key impacts, risks, and opportunities	<a href="#">ESG Impact Assessment, Business Risk Management, Most Recent CDP Response, 2021 Annual Report</a>
<b>Ethics and integrity</b>	
102-16 Values, principles, standards, and norms of behavior	<a href="#">Our Company, Diversity, Equity &amp; Inclusion, 2021 Annual Report, Responsible Business, 2022 Proxy Statement, Diversity Commitment, Codes of Ethics</a>
102-17 Mechanisms for advice and concerns about ethics	<a href="#">Corporate Governance Guidelines, Codes of Ethics, Compliance and Ethics</a>
<b>Governance</b>	
102-18 Governance structure	<a href="#">Responsible Business, Corporate Governance Guidelines, 2022 Proxy Statement, 2021 Annual Report</a>
102-19 Delegating authority	<a href="#">Responsible Business, Colleagues, Corporate Governance Guidelines</a>
102-20 Executive-level responsibility for economic, environmental, and social topics	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines, Most Recent CDP Response, Diversity, Equity &amp; Inclusion, Message from our Chairman, President &amp; CEO</a>
102-21 Consulting stakeholders on economic, environmental, and social topics	<a href="#">ESG Impact Assessment</a>
102-22 Composition of the highest governance body and its committees	<a href="#">Responsible Business, 2022 Proxy Statement, Corporate Governance Guidelines</a>
102-23 Chair of the highest governance body	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines</a>
102-24 Nominating and selecting the highest governance body	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines, Most Recent CDP Response, Diversity, Equity &amp; Inclusion</a>
102-25 Conflicts of interest	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines</a>
102-26 Role of highest governance body in setting purpose, values, and strategy	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines</a>
102-27 Collective knowledge of highest governance body	<a href="#">2022 Proxy Statement, Corporate Governance Guidelines</a>
102-28 Evaluating the highest governance body's performance	<a href="#">Responsible Business, 2022 Proxy Statement</a>
102-29 Identifying and managing economic, environmental, and social impacts	<a href="#">ESG Impact Assessment, Business Risk Management, Most Recent CDP Response, Diversity, Equity &amp; Inclusion, Message from our Chairman, President &amp; CEO</a>
102-31 Review of economic, environmental, and social topics	<a href="#">ESG Impact Assessment, Most Recent CDP Response, Diversity, Equity &amp; Inclusion</a> ; ESG Council established in 2020
102-32 Highest governance body's role in sustainability reporting	Our Executive Vice President of Corporate Responsibility reviews and approves Comerica's Corporate Responsibility Report.
102-33 Communicating critical concerns	<a href="#">Business Risk Management, Code of Business Conduct, Employee Engagement</a>
102-35 Remuneration policies	<a href="#">Responsible Business, 2022 Proxy Statement, Corporate Governance Guidelines</a>
102-36 Process for determining remuneration	<a href="#">Corporate Governance, 2022 Proxy Statement, Corporate Governance Guidelines</a>

GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
102-37 Stakeholders' involvement in remuneration	<a href="#">Corporate Governance, 2022 Proxy Statement, Corporate Governance Guidelines</a>
Stakeholder engagement	
102-40 List of stakeholder groups	<a href="#">ESG Impact Assessment</a>
102-41 Collective bargaining agreements	Comerica does not have any employees under collective bargaining agreements.
102-42 Identifying and selecting stakeholders	<a href="#">ESG Impact Assessment</a>
102-43 Approach to stakeholder engagement	<a href="#">ESG Impact Assessment</a>
102-44 Key topics and concerns raised	<a href="#">ESG Impact Assessment</a>
Reporting practice	
102-45 Entities included in the consolidated financial statements	<a href="#">2021 Annual Report</a>
102-46 Defining report content and topic Boundaries	<a href="#">ESG Impact Assessment</a>
102-47 List of material topics	<a href="#">ESG Impact Assessment</a>
102-48 Restatements of information	There were no material restatements of information provided in this report. The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our 2021 Comerica Incorporated Annual Report (herein referred to as <a href="#">2021 Annual Report</a> ). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2021. References to the "Board" refer to the Board of Directors of Comerica Incorporated.
102-49 Changes in reporting	There were no significant changes from previous reporting periods in the list of material topics and topic boundaries.
102-50 Reporting period	<a href="#">About this Report</a>
102-51 Date of most recent report	Our most recent previous Corporate Responsibility Report was issued in August 2021. <a href="#">Comerica 2020 Corporate Responsibility Report</a>
102-52 Reporting cycle	<a href="#">About this Report</a>
102-53 Contact point for questions regarding the report	To learn more about sustainability and corporate responsibility at Comerica, or to provide feedback on our reporting, contact Scott Beckerman, Director of Corporate Sustainability, at <a href="mailto:jsbeckerman@comerica.com">jsbeckerman@comerica.com</a> or visit us at <a href="#">Comerica.com/sustainability</a> .
102-54 Claims of reporting in accordance with the GRI Standards	We use the internationally-recognized GRI Sustainability Reporting Standards to guide our reporting and track our progress. This report has been prepared in accordance with the GRI Standards: Core option and includes the General Disclosures as well as Topic-Specific Disclosures relevant to Comerica. This report is Comerica's ninth GRI-based Sustainability/Corporate Responsibility Report.
102-55 GRI content index	This <a href="#">GRI Content Index</a>
102-56 External assurance	This report has not been externally assured. However, we annually assure our Scope 1, 2, and 3 greenhouse gas (GHG) emissions using ISO 14064-3 (limited assurance). Please review our most recent <a href="#">GHG emissions verification declaration</a> .

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
<b>Topic-Specific Disclosures</b>		
<b>General Disclosures</b>		
<b>GRI 200 Economic Standard Series</b>		
<b>GRI 201 Economic Performance 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	This is not a Comerica GRI Impact Topic. <a href="#">2021 Annual Report</a>  This is not a Comerica GRI Impact Topic, <a href="#">Business Risk Management, 2021 Annual Report</a>  This is not a Comerica GRI Impact Topic, <a href="#">Business Risk Management, 2021 Annual Report</a>
GRI 201: Economic Performance	201-2 Financial implications and other risks and opportunities due to climate change	<a href="#">Climate Change Impacts, Most Recent CDP Response, Key Metrics (Environment)</a>
<b>GRI 203 Indirect Economic Impacts 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	Our Comerica GRI Impact Topics, <a href="#">ESG Lending &amp; Investment, Financial Inclusion &amp; Financial Literacy, Community Investment &amp; Development, Volunteerism &amp; Philanthropy and Diversity, Equity &amp; Inclusion</a> align with the GRI 203 Indirect Economic Impact disclosure.  <a href="#">ESG Impact Assessment, ESG-Related Lending &amp; Investment, Environmentally Beneficial Lending, Financial Inclusion and Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Diversity, Equity &amp; Inclusion</a>
GRI 203: Indirect Economic Impacts	203-1 Infrastructure investments and services supported  203-2 Significant indirect economic impacts	<a href="#">Key Metrics (Community), Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Community Reinvestment Act Page on Comerica.com</a>  <a href="#">Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Community Reinvestment Act page on Comerica.com, Key Metrics</a>
<b>GRI 204 Procurement Practices 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	This is not a Comerica GRI Impact Topic. <a href="#">Supplier Diversity Program</a>  This is not a Comerica GRI Impact Topic. <a href="#">Supplier Diversity Program, Supplier Diversity, Supplier Risk Management, Most Recent CDP Response (question 12.1a), Key Metrics (Diversity, Equity &amp; Inclusion), Key Metrics (Supplier Sustainability Engagement)</a>  This is not a Comerica GRI Impact Topic. <a href="#">Supplier Diversity Program, Supplier Diversity, Supplier Risk Management, Most Recent CDP Response (question 12.1a), Key Metrics (Diversity, Equity &amp; Inclusion), Key Metrics (Supplier Sustainability Engagement)</a>
GRI 204: Procurement Practices	204-1 Proportion of spending on local suppliers	50% of our supply base (by number of suppliers) and 32% of the total spend is located in two of our key markets: Michigan and Texas. We use approximately 1,056 suppliers in Michigan and 589 suppliers in Texas.
<b>GRI 205 Anti-corruption 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components	Our GRI Impact Topics, <a href="#">Anti-Corruption, Ethics and Countering Bribery, Business Risk Management</a> , align with GRI 2015 Anti-corruption.  <a href="#">ESG Impact Assessment, Compliance and Ethics</a>  <a href="#">Compliance and Ethics, Business Risk Management, 2021 Annual Report, Corporate Governance</a>

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
	103-3 Evaluation of the management approach	<b>Compliance and Ethics, Business Risk Management, 2021 Annual Report, Corporate Governance, Key Metrics (Responsible Business)</b>
GRI 205: Anti-corruption	205-1 Operations assessed for risks related to corruption	Comerica's Risk and Control Self-Assessment process documents Operational Risks. This risk assessment is conducted by business units and updated annually. Significant Operational Risks are identified in <b>Comerica's 2021 10-K</b> (Item 1A-Risk Factors).
<b>GRI 206 Anti-competitive Behavior 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, <b>Anti-Corruption, Ethics &amp; Countering Bribery</b> , aligns with GRI 206 Anti-competitive behavior.
	103-2 The management approach and its components	<b>ESG Impact Assessment, Compliance and Ethics</b>
	103-3 Evaluation of the management approach	<b>Compliance and Ethics</b>
GRI 206: Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	<b>Compliance and Ethics</b>
<b>GRI 207 Tax 2019</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. <b>Responsible Business, Business Risk Management, Key Metrics (Our Company)</b>
GRI 103: Management Approach	103-2 The management approach and its components	This is not a Comerica GRI Impact Topic. <b>Responsible Business, Business Risk Management</b>
GRI 103: Management Approach	103-3 Evaluation of the management approach	This is not a Comerica GRI Impact Topic. <b>Business Risk Management</b>
<b>GRI 300 Environmental Standards Series</b>		
<b>GRI 301 Materials 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, <b>Environmental Resource Management</b> , aligns with GRI 301 Materials.
	103-2 The management approach and its components	<b>ESG Impact Assessment, Environmental Policy Statement</b>
	103-3 Evaluation of the management approach	<b>Our Sustainable Operations, Environmental Policy Statement</b>
GRI 301: Materials	301-1 Materials used by weight or volume	Refer to disclosure GRI 303 Water and Effluents for information on water and GRI 306 Waste for information on waste.
	301-2 Recycled input materials used	<b>Key Metrics (Environmental Resource Management- Paper)</b>
	301-3 Reclaimed products and their packaging materials	<b>Key Metrics (Supplier Sustainability Engagement)</b>
		<b>Key Metrics (Environmental Resource Management- Waste)</b>
<b>GRI 302 Energy 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, <b>Energy &amp; Emissions</b> , aligns with GRI 302 Energy.
	103-2 The management approach and its components	<b>ESG Impact Assessment, Our Sustainable Operations</b>
	103-3 Evaluation of the management approach	<b>Our Sustainable Operations, Environmental Policy Statement, Most Recent CDP Response</b>
GRI 302: Energy	302-1 Energy consumption within the organization	<b>Our Sustainable Operations</b>
		<b>Key Metrics (Environment), Most Recent CDP Response</b>

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
	302-2 Energy consumption outside of organization	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
	302-3 Energy intensity	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
	302-4 Reduction of energy consumption	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
	302-5 Reductions in energy requirements of products and services	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
<b>GRI 303 Water and Effluents 2018</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. <a href="#">Environmental Policy Statement</a>
	103-2 The management approach and its components	<a href="#">Our Sustainable Operations</a>
	103-3 Evaluation of the management approach	<a href="#">Our Sustainable Operations</a>
GRI 303: Water and Effluents	303-3 Water withdrawal	<a href="#">Key Metrics (Water)</a>  <b>OMISSION:</b> Information not available for 303-3: Although we have a couple wells and ponds in Michigan for irrigation purposes, the overwhelming majority of our water is provided by municipal sources, with consumption tracked through the utility water meters.
<b>GRI 305 Emissions 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topics, <a href="#">Energy &amp; Emissions</a> and <a href="#">Climate Change Impacts</a> , align with GRI 305 Emissions.  <a href="#">ESG Impact Assessment, Our Sustainable Operations</a>
	103-2 The management approach and its components	<a href="#">Our Sustainable Operations, Environmental Policy Statement, Most Recent CDP Response</a>
	103-3 Evaluation of the management approach	<a href="#">Our Sustainable Operations</a>
GRI 305: Emissions	305-1 Direct (Scope 1) GHG emissions	<a href="#">Our Sustainable Operations, Key Metrics (Environment), Most Recent CDP Response</a>
	305-2 Energy indirect (Scope 2) GHG emissions	<a href="#">Our Sustainable Operations, Key Metrics (Environment), Most Recent CDP Response</a>
	305-3 Other indirect (Scope 3) GHG emissions	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
	305-4 GHG emissions intensity	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
	305-5 Reduction of GHG emissions	<a href="#">Key Metrics (Environment), Most Recent CDP Response</a>
<b>GRI 306 Waste 2020</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, <a href="#">Environmental Resource Management</a> , aligns with GRI 306 Waste.  <a href="#">ESG Impact Assessment, Our Sustainable Operations, Environmental Policy Statement</a>
	103-2 The management approach and its components	<a href="#">Our Sustainable Operations, Environmental Policy Statement</a>
	103-3 Evaluation of the management approach	<a href="#">Our Sustainable Operations, Environmental Policy Statement</a>
GRI 306: Waste	306-1 Waste generation and significant waste-related impacts	<a href="#">Key Metrics (Environment), Our Sustainable Operations, Environmental Policy Statement</a>
GRI 306: Waste	306-2 Management of significant waste-related impacts	<a href="#">Key Metrics (Environment), Our Sustainable Operations, Environmental Policy Statement</a>
GRI 306: Waste	306-3 Waste generated	<a href="#">Key Metrics (Environment), Our Sustainable Operations</a>
GRI 306: Waste	306-4 Waste diverted from disposal	<a href="#">Key Metrics (Environment), Our Sustainable Operations</a>
GRI 306: Waste	306-5 Waste directed to disposal	<a href="#">Key Metrics (Environment), Our Sustainable Operations</a>

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
<b>GRI 307 Environmental Compliance 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	<p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p><b>ESG Impact Assessment, Business Risk Management</b></p> <p>Environmental risk is an increasingly relevant and high-profile issue for the private sector. For Comerica, such risk includes both the environmental impact associated with our own operations as well as those impacts of our customers' operations.</p> <p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p><b>Business Risk Management, Environmental Risk Management, Reducing Environmental Risk through Credit and Lending.</b></p> <p><b>OMISSION:</b> Information related to management approach not provided since this is not a standalone Impact Topic.</p>
GRI 307: Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	<p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p><b>Business Risk Management, Environmental Risk Management, Reducing Environmental Risk through Credit and Lending</b></p>
GRI 308: Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	<p>There were no significant fines or monetary sanctions associated with non-compliance of environmental laws and regulations in 2021 that would have a material adverse effect on our operations or ability to perform the services we offer.</p> <p><b>Managing Supplier Sustainability Risk, Key Metrics (Environment); Most Recent CDP Response (Question 12.1a)</b></p>
<b>GRI 400 Social Standards Series</b>		
<b>GRI 401 Employment 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	<p>Our GRI Impact Topic, Talent Attraction, Development &amp; Retention, aligns with GRI 401 Employment.</p> <p><b>ESG Impact Assessment, Talent Attraction, Development &amp; Retention, Employee Engagement, Diversity, Equity &amp; Inclusion</b></p> <p><b>Talent Attraction, Development &amp; Retention, Employee Engagement, Diversity, Equity &amp; Inclusion, Comerica's 2021 10-K (Human Capital Disclosure, Pages 11-12)</b></p> <p><b>Talent Attraction, Development &amp; Retention, Employee Engagement, Diversity, Equity &amp; Inclusion, Comerica's 2021 10-K (Human Capital Disclosure, Pages 11-12)</b></p>
GRI 401: Employment	401-1 New employee hires and employee turnover  401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p><b>Key Metrics (Colleagues)</b></p> <p><b>Talent Attraction, Development &amp; Retention, Key Metrics (Colleagues)</b></p>

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
<b>GRI 402 Labor/Management Relations 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, Employee Engagement, aligns with GRI 402 Labor/Management Relations.  <b>ESG Impact Assessment, Colleagues, Employee Engagement</b>
	103-2 The management approach and its components	<b>Talent Attraction, Development &amp; Retention, Employee Engagement, Comerica's 2021 10-K (Human Capital Disclosure, Pages 11-12)</b>
	103-3 Evaluation of the management approach	<b>Talent Attraction, Development &amp; Retention, Employee Engagement, Comerica's 2021 10-K (Human Capital Disclosure, Pages 11-12)</b>
GRI 402: Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	The minimum notice period for significant operational changes is 45 days (6.4 weeks) unless the change triggers the provisions of the Worker Adjustment and Retraining Notification (WARN) act in which case a minimum of 60 days notice is provided.
<b>GRI 403 Occupational Health and Safety 2018</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our new GRI Impact Topic, Health, Safety & Well-Being, aligns with GRI 403 Occupational Health and Safety.  Employee Health & Safety was not listed as an Impact Topic when our ESG Impact Assessment Report was last updated. However, it has been added since the COVID-19 pandemic increased its importance during 2020 and 2021 for Comerica and throughout the financial services industry.
	103-2 The management approach and its components	<b>Health, Safety &amp; Well-being, 2021 Annual Report- COVID-19 Response &amp; Recovery (Page 2)</b>
	103-3 Evaluation of the management approach	<b>Health, Safety &amp; Well-being, 2021 Annual Report- COVID-19 Response &amp; Recovery (Page 2)</b>
GRI 403: Occupational Health and Safety	403-6: Promotion of worker health	<b>Health, Safety &amp; Well-being, 2021 Annual Report- COVID-19 Response &amp; Recovery (Page 2)</b>
<b>GRI 404 Training and Education 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, Talent Attraction, Retention & Development, aligns with GRI 404 Training and Education.  <b>ESG Impact Assessment, Talent Attraction, Development &amp; Retention</b>
	103-2 The management approach and its components	<b>Key Metrics (Responsible Business), Key Metrics (Colleagues)</b>
	103-3 Evaluation of the management approach	<b>Talent Attraction, Development &amp; Retention, Diversity, Equity &amp; Inclusion</b>
GRI 404: Training and Education	404-1 Average hours of training per year per employee	<b>Key Metrics (Colleagues)</b>
	404-2 Programs for upgrading employee skills and transition assistance programs	<b>Talent Attraction, Development &amp; Retention, Learning and Development, Key Metrics (Colleagues)</b>
<b>GRI 405 Diversity and Equal Opportunity 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our Impact Topic, Diversity, Equity & Inclusion, aligns with GRI 405 Diversity and Equal Opportunity. We added the word "Equity" to our former Diversity & Inclusion Impact topic in 2021. The name will be updated in the ESG Impact Assessment report during its next update. <b>ESG Impact Assessment, Diversity, Equity &amp; Inclusion</b>
	103-2 The management approach and its components	<b>Diversity, Equity &amp; Inclusion</b>
	103-3 Evaluation of the management approach	<b>Diversity, Equity &amp; Inclusion</b>
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	<b>Corporate Governance, Diversity, Equity &amp; Inclusion, Board Diversity, Key Metrics (Diversity, Equity &amp; Inclusion), Comerica EEO-1 Statement</b>

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
	405-2 Ratio of basic salary and remuneration of women to men	<b>OMISSION:</b> Aggregated data on remuneration without detailed accompanying context makes broad comparisons difficult. We continue to evaluate this issue and expect to make additional disclosures in the future.
<b>GRI 412 Human Rights Assessment 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
	103-2 The management approach and its components	This is not a Comerica GRI Impact Topic.
	103-3 Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Comerica primarily does business in the United States and has no significant presence or investment in countries where there is a known lack of human rights protection. Accordingly, we do not screen suppliers or investments specifically for human rights issues at this time.
<b>GRI 413 Local Communities 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topics, <a href="#">Community Investment &amp; Development; Volunteerism &amp; Philanthropy, Financial Inclusion &amp; Financial Education</a> , align with GRI 413 Local Communities.  <a href="#">ESG Impact Assessment, Community Investment &amp; Development, Financial Inclusion, Financial Education, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Community Reinvestment Act page on Comerica.com, Business Risk Management</a>
	103-2 The management approach and its components	<a href="#">Community Investment &amp; Development, Financial Inclusion, Financial Education, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Community Reinvestment Act page on Comerica.com, Business Risk Management</a>
	103-3 Evaluation of the management approach	<a href="#">Community, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Diversity Commitment, Comerica Charitable Giving, Community Reinvestment Act page on Comerica.com, Business Risk Management, Key Metrics (Community)</a>
GRI 413: Local Communities	413-2 Operations with significant actual and potential negative impacts on local communities	<a href="#">Community, Community Reinvestment page on Comerica.com.</a>  <b>OMISSION:</b> Information not available. Operations with significant actual and potential negative impacts on local communities not provided.
<b>GRI 415 Public Policy 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our GRI Impact Topic, <a href="#">Public Policy &amp; Government Relations</a> , aligns with GRI 415 Public Policy.  <a href="#">ESG Impact Assessment, Public Policy &amp; Government Relations, Political Activities and Contributions</a>
	103-2 The management approach and its components	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>
	103-3 Evaluation of the management approach	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>
GRI 415: Public Policy	415-1 Political contributions	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>
<b>GRI 417 Marketing and Labeling 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
	103-2 The management approach and its components	This is not a Comerica GRI Impact Topic.
	103-3 Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
GRI 417: Marketing and Labeling	417-2 Incidents of non-compliance concerning product and service information and labeling	There were no significant fines in 2021 for non-compliance with laws and regulations concerning the provision and use of products and services that would have a material adverse effect on our operations or ability to perform the services we offer.
<b>GRI 418 Customer Privacy 2016</b>		

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	Our GRI Impact Topic, <a href="#">Privacy and Information Protection</a> , aligns with GRI 418 Customer Privacy.  <b>ESG Impact Assessment, Privacy &amp; Information Security, Security Commitment</b>  <b>Privacy &amp; Information Security, Security Commitment</b>  <b>Privacy &amp; Information Security, Security Commitment</b>
GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<b>Key Metrics (Customers)</b>
<b>GRI 419 Socioeconomic Compliance 2016</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary  103-2 The management approach and its components  103-3 Evaluation of the management approach	Our Impact Topic, <a href="#">Community Investment &amp; Development</a> , aligns with GRI 419 Socioeconomic Compliance.  <b>ESG Impact Assessment, Business Risk Management, Community Investment &amp; Development</b>  <b>Community, Community Reinvestment Act page on Comerica.com</b>  <b>Community, Community Reinvestment Act page on Comerica.com</b>
GRI 419: Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	No significant fines or non-monetary sanctions for non-compliance with laws or regulations in 2021 that would have a material adverse effect on our operations or ability to perform the services we offer.
<b>Comerica Impact Topic: Innovation &amp; Technology</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our Impact Topic, <a href="#">Innovation &amp; Technology</a> , does not align with a specific GRI disclosure.  <b>ESG Impact Assessment, Innovation &amp; Technology</b>
GRI 103: Management Approach	103-2 The management approach and its components	<b>Innovation &amp; Technology</b>
GRI 103: Management Approach	103-3 Evaluation of the management approach	<b>Innovation &amp; Technology</b>
N/A	Percent changes in technology solution uses	<b>Key Metrics (Customers)</b>
<b>Comerica Impact Topic: Reputation</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Our Impact Topic, <a href="#">Reputation</a> , does not align with a specific GRI disclosure.  <b>ESG Impact Assessment, Reputation and Transparency</b>
GRI 103: Management Approach	103-2 The management approach and its components	<b>Reputation and Transparency</b> At Comerica, our business is based on the collective trust of our company by customers, the communities we serve, and the entire value chain. That trust is the foundation of corporate responsibility. Our reputation is impacted by numerous internal and external factors, ranging from customer service and community development to corporate governance and our diversity.  Our leadership team actively oversees potential risks to our reputation, and our rigorous monitoring processes help guard against incidents related to compliance, operational risk, and social and environmental risks. We work to monitor these issues across our lines of business and endeavor to provide data responses to various rating and ranking agencies which have impacts on our overall reputation. Areas like our Corporate Quality Process, Investor Relations and Corporate Communications monitor activities to assess and respond to potential reputational issues. In addition, Reputation Risks are monitored and managed through our enterprise risk management framework.

GRI Standard	GRI Standard Disclosure	RESPONSE/REFERENCE/OMISSION
GRI 103: Management Approach	103-3 Evaluation of the management approach	<p><b>Reputation and Transparency</b></p> <p>Through our processes to identify and assess reputational impacts, we proactively manage a wide variety of business operations that affect our reputation. We view positive ratings, rankings and awards as verification of our approach to reputation management.</p> <p>The effectiveness of the management of this topic is addressed through the Strategic risk pillar, as described in Business Risk Management. Adjustments are made on an ongoing basis to achieve the desired programmatic outcomes in line with our strategies and risk framework.</p>
N/A	Corporate Responsibility Awards/Recognition in the reporting year	<b>Awards and Recognition</b>
<b>Comerica Impact Topic: Transparency</b>		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	<p>Our Impact Topic, <b>Transparency</b>, does not align with a specific GRI disclosure.</p> <p><b>ESG Impact Assessment, Reputation and Transparency</b></p>
GRI 103: Management Approach	103-2 The management approach and its components	<p><b>Reputation and Transparency</b></p> <p>Transparent disclosure instills confidence and trust in our company, and our stakeholders view it as one of the more significant corporate responsibility topics for our business. We are committed to implementation, control and maintenance of systems and procedures to obtain and verify information we disclose. We also comply with numerous disclosure obligations, such as those found in our SEC filings and other regulatory filings. All materials are easily accessible on our website <a href="#">Comerica Investors - Investor Overview</a>, including investor presentations, financial reports, proxy statements, SEC filings and news releases. Also, regulatory required data can be found at <a href="#">Institution Profile - National Information Center (ffiec.gov)</a>.</p>
GRI 103: Management Approach	103-3 Evaluation of the management approach	<p><b>Reputation and Transparency</b></p> <p>Comerica provides extensive information on Comerica.com, including investor presentations, annual and quarterly reports, our proxy statements and news releases. Our compliance with disclosure obligations demonstrates our</p>
N/A	Number of years that Comerica has published an annual sustainability and/or corporate-responsibility themed report	14 consecutive years

# SASB Standards Content Index

Throughout this report, we reference topics and metrics contained in the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Financial Sector. The tables below provides the SASB topic, SASB Code, a description of the accounting metric and an indication if we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents and a link or reference to the location of the disclosure. Comments are also included to provide additional context around our disclosure.

While there are other SASB financial services standards that contain information that may be relevant to a portion of our operations, Comerica has determined the Commercial Banks standards is most applicable for our core business. Additionally, SASB standards use the Sustainable Industry Classification System® (SICS®) to group companies based on shared sustainability risks and opportunities and the SICS® Look-up Tool identified Comerica as classified in the Financials industry and Commercial Banks sector. Where the response to the Commercial Banking standard also includes a response to an additional standard, that SASB Code is also included for reference.

SASB Financials Sector Commercial Banking Standard Disclosures					
SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
Data Security	FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Partially	<a href="#">Key Metrics (Customers)</a>	Metrics (2) and (3) not provided.
	FN-CF-230a.1	FN-CB-230a.2 Description of approach to identifying and addressing data security risks	Yes	<a href="#">Privacy &amp; Information Security, Security Commitment</a>	–
Financial Inclusion & Capacity Building	FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	Yes	<a href="#">Community Investment &amp; Development; Key Metrics (Customers); Key Metrics (Community)</a>	–
	FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	Partially	<a href="#">2021 Annual Report (p. F-22)</a>	Metrics provided not explicitly separated by small business and community development
Incorporation of ESG Factors in Credit Analysis	FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Partially	<a href="#">Key Metrics (Community)</a>	Access Checking account fee waived for customers using direct deposit
	FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Yes	<a href="#">Key Metrics (Community); Financial Inclusion; Financial Education</a>	–
Incorporation of ESG Factors in Credit Analysis	FN-CB-410a.1	Commercial and industrial credit exposure, by industry	Partially	<a href="#">2021 Annual Report (p. F-23 to F-25)</a>	Specific divisions provided do not completely align with SASB categories
	FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Yes	<a href="#">Business Risk Management; Environmental Risk Management; Reducing Environmental Risk through Credit and Lending</a>	–

**SASB Financials Sector Commercial Banking Standard Disclosures**

<b>SASB Topic</b>	<b>SASB Code</b>	<b>Accounting Metric</b>	<b>Disclosure Met?</b>	<b>Link or Direct Response</b>	<b>Comments</b>
Business Ethics	FN-CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Partially	<a href="#">2021 Annual Report, p. F-94</a>	All legal proceeding expenses declared in Note 21
	FN-AC-510a.1	Description of whistleblower policies and procedures	Yes		
Systemic Risk Management	FN-CB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Partially	<a href="#">Business Risk Management; 2021 Annual Report, (p. 2, F-19, F-27)</a>	–
	FN-AC-550a.2	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Yes		
Activity Metrics	FN-CB-000.A	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, Yes and (c) corporate	Yes	<a href="#">2021 Annual Report (p. F-4); Key Metrics (Community); Financial Inclusion</a>	(1) and (b) not met
	FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, Yes and (c) corporate	Yes		

# TCFD Index

Comerica has not yet developed a stand-alone TCFD report, but we intend to do so. This TCFD Index represents information that we have shared in other recent public documents, which speak to TCFD's guidance. Where available, we have provided links to the specific disclosures. Updated links to the most recent 2022 CDP Response were added in August 2022.

Reporting Status



Fully reported public disclosure



Partial reported public disclosure



No public disclosure

Disclosure	Reporting Status	Response/External Links
<b>GOVERNANCE:</b> Disclose the organization's governance around climate-related risks and opportunities.		
a) Describe the board's oversight of climate-related risks and opportunities.		<b>2022 CDP Response- C1.1, C1.1a, C1.1b, C1.1d</b> <b>Environmental Policy Statement</b> <b>Enterprise Risk Committee of the Board Charter- Section III (o)</b>
b) Describe management's role in assessing and managing climate-related risks and opportunities.		<b>2022 CDP Response- C1.2, C1.3, C1.3a</b> <b>Message from our Chairman, President and CEO Environment</b>
<b>STRATEGY:</b> Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy and financial planning		
a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.		<b>2022 CDP Response- C2.1, C2.1a, C2.1b, C2.2, C2.2a, C2.3, C2.3b</b> Additional information to be provided in our forthcoming TCFD report
b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.		<b>2022 CDP Response- C3.1</b> <b>2022 CDP Response- C3.3</b> <b>2022 CDP Response- C3.4</b>
c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.		<b>2022 CDP Response- C3.2, C3.2a, C3.2b</b> Additional information to be provided in our forthcoming TCFD report
<b>RISK MANAGEMENT:</b> Disclose how the organization identifies, assesses and manages climate-related risks.		
a) Describe the organization's processes for identifying and assessing climate-related risks.		<b>2022 CDP Response- C2.1, C2.1a, C2.1b, C2.2, C2.2a, C-FS2.2b, C-FS2.2d ESG Impact Assessment</b>
b) Describe the organization's processes for managing climate-related risks.		<b>2022 CDP Response- C2.2, C2.2a, C-FS2.2b, C-FS2.2d Environment</b>
c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.		<b>2022 CDP Response- C2.2, C2.2a, C-FS2.2b, C-FS2.2d</b> Additional information to be provided in our forthcoming TCFD report

Disclosure	Reporting Status	Response/External Links
<b>METRICS AND TARGETS:</b> Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities		
a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.		<b>Key Metrics (Environment)</b> <b>2022 CDP Response- C6.1, C6.2, C6.3, C6.5</b>
b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.		<b>Current Emissions Verification Declaration</b> <b>Key Metrics (Environment)</b> <b>2022 CDP Response- C6.1, C6.2, C6.3, C6.5</b> Additional information to be provided in our forthcoming TCFD report. We are in the process of calculating loan-related greenhouse gas emissions using the PCAF financed emissions methodology and have committed to report publicly according to the PCAF guidance in 2023.
c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.		<b>Our Sustainable Operations</b> <b>2022 CDP Response- C4.1, C4.1a, C4.2, C4.2b, C4.3, C4.3a, C4.3b, C4.3c</b> Additional information to be provided in our forthcoming TCFD report



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EQUAL OPPORTUNITY LENDER.  
EQUAL HOUSING LENDER NMLS ID 480990.

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