

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 Americans, 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 Diversity			
Produce Equitable Gender and Racial Interview Slates (Senior leader and VP positions)	Provide Mentorship and Sponsorship (All women and minority on succession plans)	Increase Equity in Succession Plans (All women and minority on succession plans)	Increase Equity in Gender and Racial Representation (Women and Minorities)

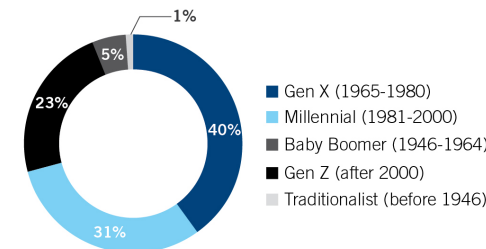
Business Outreach
Increase Involvement in Business Resource Groups
Multicultural Markets Business

Social Impact		Compliance and Risk	
Increase Volunteerism in Our Communities	Drive Financial Education to Low Income Communities	Expand Equity for Minority Suppliers through Inclusion	Increase Equity in Suppliers Spend with Minority Suppliers
Total Hours Contributed	CRA Qualified Volunteerism	Supplier Diversity	Supplier Diversity

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 Colleagues¹	65	41
Officials and Managers²	52	29
Executive Officers³	43	21

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

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

² Based on EEO-1 job classifications

³ 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 though a focus on women, minority populations, individuals with disabilities, veterans and colleagues of varying ages.

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 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

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
Bronze-level certified	4,857	0.7%
Silver-level certified	4,076	1.5%
Gold-level certified	3,412	2.8%
Platinum-level certified	2,099	4.3%

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



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



National Diversity Council Index notable mention



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

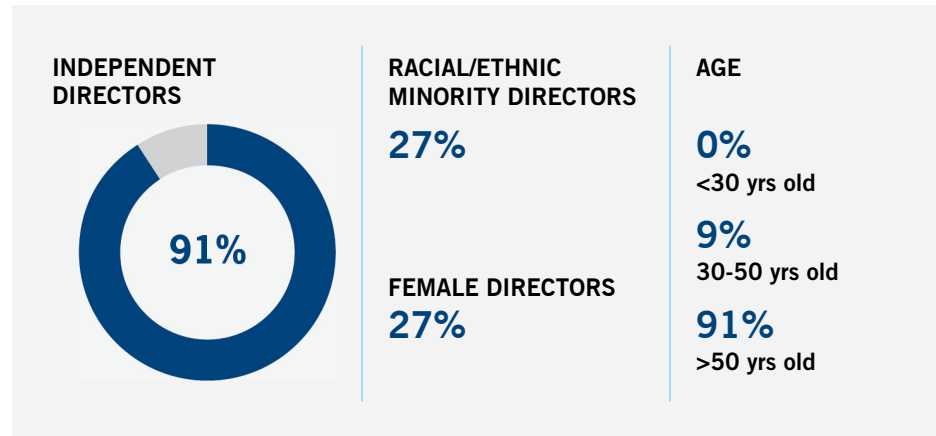


"Best in Class" for Excellence in Supplier Diversity Award – Great Lakes Women's Business Council

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

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.

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.



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.

Key Metrics Table

DIVERSITY, EQUITY & INCLUSION	2019	2020	2021
Diversity, Equity & Inclusion - Internal⁴			
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 Key Metrics - Colleagues .			
Diversity, Equity & Inclusion - External			
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 ⁵	56	89	98
Percent of contracts awarded to diverse suppliers for relevant RFPs ⁶	34	35	33
Board Diversity			
Number of Board Directors	11	11	11
% Independent Directors	91	91	91
% Racial/Ethnic Minority Directors ⁷	27	27	27
% Female Directors ⁷	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

⁴ **EEO-1 categories** are used for breakdown of Women and Racial/Ethnic Minority employee numbers.

⁵ Total Diverse Supplier Spend includes Tier 1 and Tier 2 spend from reporting period of 4Q 2020 to 3Q 2021.

⁶ Percentage of projects that included diverse suppliers that were sourced to diverse suppliers

⁷ 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)