

PARITY INTERCULTURALISM
WORLD ETHNIC
CELEBRATE MINORITIES BIASES
INDIGENOUS DIVERSITY
PHILOSOPHY RACIAL
MULTICULTURALISM COMMUNITY
IMMIGRANTS

DIVERSITY & INCLUSION

2017 Annual Report



RAISE YOUR EXPECTATIONS.



SUCCESS THROUGH
**DIVERSITY
& INCLUSION**

DIFFERENCE
IDEOLOGIES
EQUAL
VALUES
IDENTITY
ETHNICITY
INTEGRATION
RELIGIOUS
CULTURAL
VOICE
POLICY
CULTURE
RESPECT
GENDER
POPULATION
DEMOGRAPHICS

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, including the Growth in Efficiency and Revenue initiative (“GEAR Up”), 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 the economic benefits of the GEAR Up initiative, 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 are changes in general economic, political or industry conditions; changes in monetary and fiscal policies; whether Comerica may achieve opportunities for revenue enhancements and efficiency improvements under the GEAR Up initiative, or changes in the scope or assumptions underlying the GEAR Up initiative; operational difficulties, failure of technology infrastructure or information security incidents; reliance on other companies to provide certain key components of business infrastructure; Comerica's ability to maintain adequate sources of funding and liquidity; the effects of more stringent capital or liquidity requirements; declines or other changes in the businesses or industries of Comerica's customers; unfavorable developments concerning credit quality; changes in regulation or oversight; changes in the financial markets, including fluctuations in interest rates and their impact on deposit pricing; transitions away from LIBOR towards new interest rate benchmarks; reductions in Comerica's credit rating; 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 interdependence of financial service companies; the implementation of Comerica's strategies and business initiatives; changes in customer behavior; management's ability to maintain and expand customer relationships; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events including, but not limited to, hurricanes, tornadoes, earthquakes, fires, droughts and floods; the effects of recent tax reform and potential legislative, administrative or judicial changes or interpretations related to these and other tax regulations; any future strategic acquisitions or divestitures; management's ability to retain key officers and employees; the impact of legal and regulatory proceedings or determinations; the effects of terrorist activities and other hostilities; 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 11 of Comerica's Annual Report on Form 10-K for the year ended December 31, 2017. 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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2017 Diversity & Inclusion at a Glance

39%

of Comerica's workforce are racial/ethnic minorities



27%

of Comerica's Board of Directors are women



27%

of Comerica's Board of Directors are racial/ethnic minorities



66%

of Comerica's workforce are women



88%

of employees are enrolled in the voluntary Masters of Diversity Awareness training



Comerica has earned 100% rating for 4 consecutive years on the Human Rights Campaign Corporate Equality Index



Market Segmentation Initiative Teams focused on reaching diverse customers; impacted **over \$300 million** in new account openings

\$64 MILLION

in annual spend with diverse suppliers



9 YEARS

Comerica has been ranked as a top company for diversity on DiversityInc survey



18% INCREASE

in colleagues who are military veterans

Ages of Comerica's workforce

33%

Baby Boomer

39%

Generation X

28%

Millennial



NEARLY 68,000 HOURS

of volunteer time donated to nonprofits by Comerica colleagues, worth **over \$1.6 million**

17

Employee Resource Network Groups represent the interests of these communities:
African-American, Asian Indian, Hispanic, LGBT & Allies, Middle Eastern, Quantitative Professionals, Veteran, Women and Young Professionals

Tenure of Comerica's workforce

42%

0-5 years

25%

6-15 years

17%

16-25 years

16%

26+ years

Where Comerica's Employees Work



61%

Michigan



20%

Texas



15%

California



2%

Arizona



2%

Other

Comerica's major markets. Data as of 12/31/2017.

Message from our Chief Diversity Officer



*Nathaniel Bennett
Senior Vice President and Chief
Diversity Officer and Head of
Talent Acquisition, Comerica
Incorporated*

As you read this Diversity and Inclusion Annual Report, you will quickly discover that diversity is not *only* a core value of Comerica bank.

It is also a business *imperative*.

The commitment of our colleagues, the support of our leadership, and the outstanding recognition we've received for these efforts have helped to make us a diverse employer of choice.

Comerica has a unique culture. It is diverse, innovative and inclusive, the result of which is that our colleagues enjoy a tremendous work family.

We seek opportunities not to be average, but to stand out from the rest while raising expectations of what a bank can be. Even as we make this promise to our customers, there is also a promise to our colleagues that makes Comerica who we are. Our unwavering commitment to each other speaks to the heart of our colleague's promise.

Because of the foundation of inclusion, new colleagues can assimilate into the culture while feeling welcomed right from the start. There are no outsiders.

This report provides an overview of the strong commitment our bank and our colleagues have made, and continue to make, to diversity and inclusion.

OUR COMPANY

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and is among the 25 largest financial holding companies in the United States. Comerica focuses on relationships, and helping people and businesses be successful. In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico.

For more than 168 years, our colleagues have focused on building long-term relationships and delivering the highest quality financial services. At year-end 2017, Comerica served almost one million customers. Comerica is strategically aligned into three business segments:

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

As of December 31, 2017, our total assets stood at \$72 billion, total loans at \$49 billion and total deposits at \$58 billion. Additional metrics are provided in the [Key Statistics Table](#) attached to this report and in Comerica's [2017 Annual Report](#).

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

Comerica At A Glance: 2017

<ul style="list-style-type: none"> • Among the 25 largest U.S. financial holding companies 	<ul style="list-style-type: none"> • Highest concentration of commercial and industrial (C&I) loans among the top 25 U.S. financial holding companies (as of 12/31/17)
<ul style="list-style-type: none"> • 437 U.S. banking centers and 589 ATMs concentrated in Michigan, Texas, California, Arizona and Florida (as of 12/31/17) 	<ul style="list-style-type: none"> • Located in seven of the 10 largest cities in the U.S.: Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose
<ul style="list-style-type: none"> • No. 3 pre-paid commercial card issuer 	<ul style="list-style-type: none"> • Approximately 8,000 employees

Comerica Strengths

Long History	Nimble Size (\$72 billion in Assets at 12/31/17)	Attractive Footprint	Relationship Banking Strategy	Conservative
Founded over 168 years ago	Products and services of a large bank with a culture of a community bank	Strong presence in Texas, California and Michigan	Trusted Advisor approach	Strong capital position, prudent credit underwriting

Comerica Bank Demonstrates Support for Employee Service in the National Guard and Reserve



Employer Support of the Guard and Reserve (ESGR) is a Department of Defense agency established in 1972 to develop and maintain employer support for Guard and Reserve service. Paramount to ESGR's mission is encouraging the employment of Guardsmen and Reservists who bring integrity, global perspective and proven leadership to the civilian workforce.



On November 2, 2017, Comerica Bank Texas Market President Peter Sefzik signed a Statement of Support for the National Guard and Reserve. The signing ceremony took place at the Comerica Bank Tower in Dallas, Texas. Mr. Sefzik was joined by Craig McKinley, ESGR National Chairman. The Statement of Support confirms Comerica Bank joins other employers in pledging:

- We fully recognize, honor and comply with the Uniformed Services Employment and Re-Employment Rights Act (USERRA).
- Our managers and supervisors will have the tools they need to effectively manage those employees who serve in the Guard and Reserve.
- We appreciate the values, leadership and unique skills service members bring to the workforce and will encourage opportunities to hire Guardsmen, Reservists and Veterans.
- We will continually recognize and support our country's service members and their families in peace, in crises and in war.



"Comerica's support of the National Guard and Reserve reaffirms our proud commitment to provide career opportunities to the brave men and women who serve our country. They bring leadership, discipline, initiative and unique problem-solving skills to the workplace, which make them ideally suited for a variety of professions. When companies hire our military members, we all benefit."

Peter Sefzik,
Comerica Bank Texas
Market President

"Today supportive employers are critical to maintaining the strength and readiness of the nation's National Guard and Reserve units. The ESGR Statement of Support program is the cornerstone of ESGR's efforts to gain and maintain employer support. The intent of this program is to increase employer support by encouraging participating employers to act as advocates for employee participation in the military. By meeting the Statement of Support criteria, Comerica Bank will stand proudly with their National Guard and Reserve employees who continue to answer our nation's call to defend our way of life. Their personal sacrifices are essential to the strength of our nation."

Craig McKinley, ESGR National Chairman

The Comerica Promise and Our Core Values

At its core, The Comerica Promise is to raise the expectations of what a bank can be. The Comerica Promise is an employee roadmap aligned with our vision and mission, to elevate our customer and colleague working relationships. The Comerica Promise includes a Customer Promise and a Colleague Promise — statements that describe the behaviors and values that define our culture and align with our code of conduct.

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

To become the highest performing, most respected and most desired bank in the markets we serve.

Comerica's seven **Core Values** underpin our Mission and Vision and are instrumental to fulfilling our promise. Our Core Values of **Customer-centricity, Collaboration, Integrity, Excellence, Agility, Diversity** and **Involvement** reflect our commitment to corporate

responsibility and are highlighted throughout this report. For example, our colleagues demonstrate **Involvement** as they participate in Green Office Team activities and volunteer in their communities and we strive to develop a workforce rich in **Diversity** as Comerica is regarded as a diverse employer of choice.

<i>Customer-centricity</i>	<i>Collaboration</i>	<i>Integrity</i>	<i>Excellence</i>	<i>Agility</i>	<i>Diversity</i>	<i>Involvement</i>
Our decisions will be based first and foremost on what is best for our customers.	We will work as a team to do what is right by our customers and our colleagues.	We will maintain the highest ethical standards through our honesty and transparency. We will honor our commitments and take personal responsibility for our actions.	We understand there are no trade-offs or short cuts on the road to success. We will strive for greatness through continuous self-improvement.	We aspire to become a company that fully embraces innovation as a means of driving ongoing growth and prosperity. We remain flexible and adaptable to change.	We will create an environment that celebrates the differences among our colleagues and customers, with the understanding that such differences make us a stronger company.	We embrace our critical role in the communities we serve and acknowledge that our success is intertwined with theirs. We will make sustainability a priority.

Living the Promise: Comerica Supports Hurricane Disaster Relief Efforts



Above photo: Comerica Michigan Market President Mike Ritchie, assisted by Comerica Board Member Reginald Turner, provides a check to the Detroit Police Chief James Craig for the Detroit Public Safety Foundation to supplement donations from our colleagues to support first responders in Houston.



Above photo: Comerica colleagues donate critical supplies to support first responders in Houston in the aftermath of Hurricane Harvey

When hurricanes hit Texas and Florida in 2017, Comerica responded to support our customers and colleagues in the affected areas. Comerica donated \$100,000 to the American Red Cross to assist with disaster relief efforts in the aftermath of Hurricane Harvey and made a number of other donations to support relief efforts in both the Houston area and Florida, including the Texas Women's Empowerment Foundation, Change Happens Houston, Neighborhood Recovery CDC in Houston, Blue Triangle Multicultural Association in Houston, Harry Chapin Food Bank of Southwest Florida and Children's Harbor, Inc. in Pembroke Pines, Florida.

In Houston alone, Comerica has over 450 colleagues and nearly 50 banking centers as well as other offices. To support these, and other employees, Comerica established a Colleague Disaster Relief Program. The program's core is a disaster relief fund with contributions from our company as well as individual colleagues who donate to support their co-workers in times of need. The program also provides additional paid time off, personal loans, and colleague-to-colleague volunteer support.

In our Michigan Market, our colleagues reached out to support first responder in Houston by donating much-needed supplies. Comerica was proud to help the Detroit Police Department fill a semi-truck that headed from Detroit to Houston to deliver the supplies.

"Supporting our colleagues and the communities we serve is our number one priority," said Ralph W. Babb Jr., Comerica's chairman and chief executive officer. "We recognize how natural disasters the scale of Hurricane Harvey can devastate communities. And, we want to help those affected by the destruction with immediate resources, as well as assistance during the restoration period."

Hurricane Relief Efforts

Corporate donations totaling \$150,000	Donations to support first responders in Houston	Support of Customers through accommodations on fees and relaxed product limitations	Established Colleague Disaster Relief Program
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DIVERSITY AND INCLUSION

Diversity and Inclusion Vision



At Comerica, Diversity is embracing an inclusive culture that recognizes, respects and is sensitive to the differences in our community. Welcoming and supporting colleagues of all backgrounds is a pillar of [The Comerica Promise](#) and is key to the way we conduct business. To further this commitment, we developed and published our [Diversity Commitment](#) statement. This highlights our Diversity Core Value and recognizes the behaviors, values and beliefs that support a work environment in which we celebrate the differences among our employees and embraces our critical role in the communities we serve.

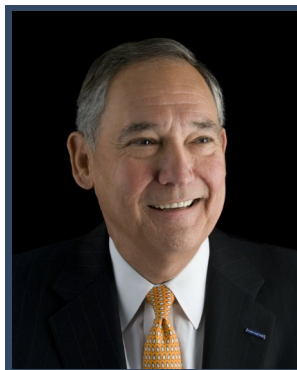
As one of Comerica's [Core Values](#), our respect for diversity permeates everything we do. Our diversity standards recognize behavior that:

- Uses and values similarities and differences in people to create a work environment that encourages creative thinking and solutions.
- Recognizes and leverages the benefits from 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.

We are dedicated to supporting and promoting diversity and inclusion, internally among our employees and leadership; and externally to our customers, suppliers and the communities where we conduct business.

2017 PROGRESS	Increased the number of military veterans in Comerica's workforce by 18 percent since implementing our veteran outreach strategy, which included working with veterans' organizations and participation in career fairs.
	Continued growth for minorities in officer roles throughout the company.
	Improved diversity education and awareness opportunities through our Masters of Diversity Awareness Program, as well as a revamped required senior leadership training focused on implicit bias, to ensure improved inclusion throughout the bank.
	Increased outreach to diverse business owners through training and networking sessions as part of our supplier diversity program.
2018 CHALLENGES	Maintain spending levels on diversity-based suppliers even as expense initiatives reduce overall spending on contingent labor.
	Retaining minority talent long enough to elevate them to the senior most levels within the organization.

Leadership and Accountability



"We all know that when we truly reflect the demographics of our markets, we will better serve our customers, grow our business and build an even stronger organization. It makes good business sense."

Ralph W. Babb Jr.
Chairman and Chief Executive Officer
Comerica Incorporated and Comerica Bank

Comerica supports diversity and inclusion through our Executive Diversity Council (EDC) comprised of Chairman and CEO, Ralph W. Babb Jr. and his leadership team. This demonstrates Comerica's commitment to diversity at the highest level of the corporation.

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, Nathaniel Bennett, who leads the Diversity and Inclusion team responsible for setting direction of the diversity and inclusion strategy.

The EDC sets annual and long-term internal diversity goals focused on four strategic areas:

- Human Capital (diversity programs, talent acquisition and colleague development)
- Business Outreach
- Community Outreach (involvement and volunteerism)
- Supplier Diversity

All of Comerica's senior executives are required to include diversity in their performance plan and objectives throughout their lines of business. This is accomplished through a Diversity and Involvement Scorecard, which is required for each division. The scorecard, reviewed on an annual basis, outlines the division's diversity goals, focused on the four areas above and measures its progress in meeting these goals. Through this process, our EDC is able to set realistic, but challenging goals that move the company further along in improving the diversity of our workforce and the creation of an inclusive work environment along with a deeper commitment to our social responsibility focus.

Qualitatively, Comerica's senior executives and Diversity leadership team work to retrieve feedback from community leaders on how Comerica can further assist and grow our diverse communities. Our relationships with local Chambers of Commerce, nonprofit organizations and community leaders allow us to remain connected and continue to build on our strategy.

Our roadmap and strategic areas are integrated in the diagram on the next page:

<i>Diversity and Inclusion Strategy Roadmap</i>			
Satisfy Shareholders:	<i>Grow Revenue</i>		<i>Increase ROI</i>
Human Capital:	<u>Business Lines:</u>	<u>Diversity Teams:</u>	<u>Business Partners:</u>
Business Outreach:	"Increase Penetration of Target Markets"	"1:1 Relationship Building"	"Centers of Influence"
Community Outreach:	Support the community Social Value	Volunteer Resources Social Responsibility	Promotes Allies Links Target Markets
Supplier Diversity:	<i>Supports Business</i>	<i>Impact Community</i>	<i>Grow Community</i>

Our Workforce

Comerica's goal is to create a workplace where the best talent seeks employment. We know that diversity in the workforce will support our mission of helping people to be successful. Also, a diverse workforce will help by connecting us to a wider customer base, enhancing community relations, and enriching our pipeline of ideas and approaches to customer service.

Diversity has been an important priority for more than 20 years. As a result of that deep-rooted commitment, we have been recognized for our efforts and ranked among the best companies for diversity by national and regional publications. Associations concerned with corporate inclusion have ranked us highly during the eight years since we began submitting information.

Diversity and Inclusion Recognition

To help benchmark our diversity efforts, we participate in recognized corporate diversity rating surveys. These include:

- *DiversityInc*
- *Black Enterprise*
- Hispanic Association on Corporate Responsibility (HACR)
- *Hispanic Business Magazine*
- Human Rights Campaign's Corporate Equality Index (CEI)
- *Latina Style Top 50*

These rating organizations have consistently ranked Comerica among the top companies for diversity efforts. We also recently received our fourth consecutive CEI rating of 100 for our work to ensure inclusion of Lesbian, Gay, Bisexual and Transgender (LGBT) colleagues and community members. Comerica was also recognized in early 2018 as a silver-level veteran friendly employer by the Michigan Veterans Affairs Agency based on our 2017 progress.

Comerica is an equal opportunity employer and our policies, programs and practices align with this commitment. Respect for human rights is also critical to our business approach. We work to provide a diverse, inclusive, safe and ethical workplace. We do so by enforcing our employee [Code of Business Conduct and Ethics for Employees](#), equal employment opportunity statements and safety and health policies while maintaining a zero-tolerance approach to workplace corruption, discrimination and harassment. Comerica recently updated our Workplace Harassment and Discrimination policy and implemented an updated sexual harassment training for all employees.

As a federal contractor, Comerica also develops affirmative action plans to ensure equal opportunities for all colleagues. Comerica's [Equal Employment Opportunity Policy](#) statement includes sexual orientation and gender identity. The statement is reviewed and signed annually by the chairman and CEO, then made available to employees.

Employee Demographics

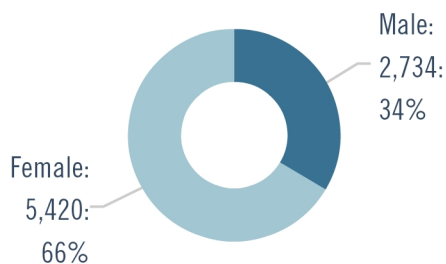
Our Workforce		
8,000 employees	5 major markets: Arizona, California, Florida, Michigan and Texas	Located in 7 of the 10 largest cities in the U.S. (Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose)

Advancing diversity in our workforce is a business imperative. In 2017, we continued our organization-wide focus to improve recruitment and retention of women and ethnic minorities especially in leadership positions through our diversity outreach, diversity awareness and learning program, and our leadership development programs.

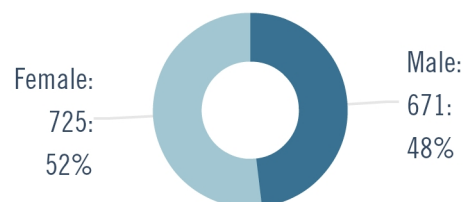
2017 Workforce Diversity Metrics

Overall, the percentage of female employees working at Comerica has remained generally consistent since 2015 and are the majority portion of our population at 66 percent. Additionally, over half (52 percent) of our Officials and Managers are females. The Officials and Managers metric is developed utilizing manager-level EEO-1 reporting categories.

Females Overall*

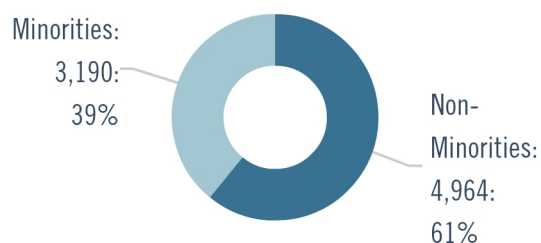


Female Officials and Managers*

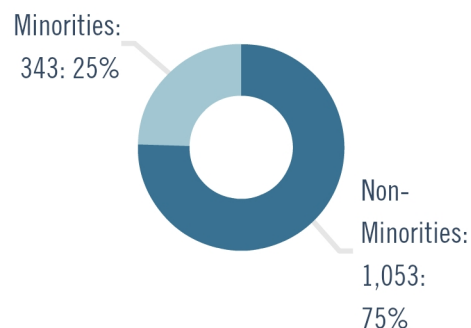


The percentage of ethnic minority employees working at Comerica has increased from 38 percent in 2016 to 39 percent in 2017. Our Officials and Manager population is made up of 25 percent ethnic minorities.

Ethnic Minority Overall*



Ethnic Minority Officials and Managers*



*Data as of 12/31/2017.

Comerica also tracks additional metrics including generation and tenure. From a generational perspective, Gen X makes up the largest group of employees at 39 percent of our workforce. Additionally, while 42 percent of Comerica's workforce has between zero and five years of service, Comerica's workforce is also highly tenured with 33 percent of our employees with 16 or more years of service. As the Millennial population continues to grow in the workplace, Comerica is sensitive to generational differences and work style. We offer various diversity training programs that address these differences and how employees can more effectively work together.

<i>Generation and Tenure Metrics</i>				
Generation	Traditionalist: <1%	Baby Boomer: 33%	Gen X: 39%	Millennial: 28%
Tenure	0-5 Years: 42%	6-15 Years: 25%	16-25 Years: 17%	26+ Years: 16%

Pay Equity

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 the best practices to reduce unconscious bias, and making hiring, promotion and compensation decisions to stimulate pay equity. Accordingly, Comerica periodically performs a compensation analysis (looking at the main components of compensation, like salary and bonus) by grade level and position to ensure similar positions are paid comparatively to the extent other factors can be equalized (i.e. time in position, performance, education, etc.). There are significant differences in job functions from the division to the individual level across our diverse organization. Given these differences, aggregated data on pay without detailed accompanying context makes broad comparisons difficult. We have engaged with outside consultants to study this issue, and have evaluated our metrics and practices. Our equal pay initiatives, as part of our broader diversity and inclusion strategy, make our company stronger and deliver value to our shareholders. Additionally, Comerica made an enterprise-wide decision to prohibit the solicitation of salary history from applicants in all of our markets.

Employee Diversity and Inclusion Engagement

We encourage employees to form employee resource network groups (ERNGs) comprised of colleagues with common interest. ERNGs are usually formed for support, discussion and networking, as well as awareness building.

Comerica's Employee Resource Network Groups

To meet our human capital and business development goals, we conduct targeted recruitment activities and support 17 ERNGs. ERNGs are self-initiated, organized groups consisting of employees with common interests and the willingness to apply those interests to support Comerica on a variety of business issues. ERNGs are open to any employee, regardless of identity, background or organizational unit and provide peer networking, mentoring and development opportunities.

ERNG categories, some of which are located in multiple markets, include: Comerica African American Network (CAAN), Hispanic Ambassadors, Comerica Asian Indian Association, LGBT and Allies Alliance, Veteran's Leadership Network, Women's Forum, Quantitative Professionals and Young Professionals Networks.

Comerica ERNGs work to enhance the value that members bring to the company by leveraging their abilities to further recruit, develop and retain talent. They also provide a sounding board for issues of concern to the ERNGs. The impact of the ERNGs extend beyond our colleagues by supporting efforts to promote volunteerism, and other positive initiatives in the community.



Comerica Hispanic Ambassadors celebrate success in outreach and participation at annual recognition events.

Diversity Awareness and Learning

We encourage our colleagues to embrace and celebrate each other's differences and require that they complete diversity education courses to foster an atmosphere of inclusion in the workplace. We feature our diversity program in our employee orientation and require annual employee diversity learning. In 2017, this learning program focused on military veterans in the workplace and in previous years some examples of the topics we focused on were generations and LGBT and allies in the workplace.

Comerica's intranet site features articles about nationally-recognized diversity months that celebrate the rich cultures and traditions celebrated in our communities, such as Black History, Hispanic Heritage, Women's History and Pride, among others.

In addition, our company-wide Master of Diversity Awareness (MDA) program, developed by Comerica colleagues, achieved an 88 percent enrollment in 2017. The MDA program covers nine dimensions of diversity through a variety of activities, and has created a healthy competition to earn bronze, silver, gold, and platinum status for achievement of different learning levels.

Year-End 2017 Status: Number of Colleagues Who Achieved MDA Level Certifications*			
5,301	4,180	3,332	1,961
Bronze-Level Certified Colleagues	Silver-Level Certified Colleagues	Gold-Level Certified Colleagues	Platinum-Level Certified Colleagues
* Cumulative (e.g., colleagues who are MDA Gold-Level certified are also included as certified at the Bronze- and Silver-Level)			

Comerica has specific learning and awareness opportunities focused on veterans for our managers and employees through the *Military 101 Introduction to Hiring Military Candidates* training, which is available through our MDA Program. This year, Comerica launched a new *Interviewing Military Veterans* training for all managers and employees involved in the hiring process. This training specifically targets the benefits of interviewing and hiring veterans.

Additionally, Comerica emphasized the importance of hiring and supporting individuals with disabilities. In 2017, a training was provided to our entire Talent Acquisition and Human Resources team on how to source, interview, accommodate and position candidates with disabilities.

Comerica's colleague-focused Local Diversity Awareness Round Tables (LDARTs) provide a local resource for diversity learning. LDART members represent the interests and needs of colleagues across a given market. The LDART members plan, communicate and execute diversity learning options for colleagues in the market.

Comerica Celebrates Diversity Events

Comerica Celebrates Diversity

Comerica's Diversity and Inclusion Department, LDART teams and ERNG teams partnered and launched monthly diversity celebrations with the theme "Comerica Celebrates Diversity." These celebrations are offered within our major markets, including California, Michigan and Texas. The goal of these celebrations is to support diversity awareness and appreciation. In an effort to ensure an inclusive workplace and enriching work life, these monthly celebrations offer a large array of opportunities to learn about, participate in and experience different heritages and cultures.

The months and heritages that will be recognized in 2018 are: Black History Month in February, National Women's History Month in March, Asian Pacific Heritage Month in May, LGBT Pride Month in June, National Hispanic-Latino Heritage Month in September/October, National Disability Employment Awareness Month and Diversity Awareness Month in October, and Veterans Day in November.

In addition to specific diversity awareness and learning, Comerica also has an organizational emphasis on development and promotional opportunities for females and minorities. Internally, Comerica offers two programs: a Leadership Development Program (LDP) and an Emerging Leader Program (ELP), which provides development training for high potential employees that not only enhances their individual skills but also helps to strategically develop the organization as a whole. The LDP strengthens the quality of the Bank's leadership pipeline and is a component of the company's strong succession planning strategy. Additionally, the ELP is designed as a thoughtful and strategic mechanism to develop a diverse, sustainable, and enduring leadership pipeline that aligns to Comerica's core values and relationship culture. A critical component of these programs is to ensure diversity among the employees who are nominated into these programs.

Two additional programs that are offered to employees include the Inforum program, and the Mentium Momentum program. Momentum focuses on leadership skills and provides structured interaction with peers who have similar developmental interests and goals, plus formal business-education sessions. Inforum is offered to female employees in Comerica's Michigan market at three different career levels: NextUP Leadership for early career, Genuine Leadership Presence for vice presidents, and Executive Leadership for experienced vice presidents and senior vice presidents.

Attracting Diverse Talent

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

In an effort to support diverse recruiting in 2017, Comerica developed a relationship with The Alumni Society, which is a membership-based organization for mid-to-senior-level Latino leaders who are alumni of the most competitive colleges and universities. Additionally, Comerica continued our relationship with Association for Latino Professionals for America (ALPFA), a professional association dedicated to enhancing opportunities for Latinos in accounting, finance and related positions. Comerica continued our long-standing relationship with the Arab Community Center for Economic and Social Services (ACCESS). Comerica has also maintained a strong relationship with the Department of Rehabilitation/National Employment Team Vocational Rehabilitation, Getting Hired, U.S. Chamber of Commerce Hiring our Heroes and the U.S. Department of Veteran Affairs to recruit veterans and individuals with disabilities.

Outreach to Individuals with Disabilities

Comerica continued our partnership with GettingHired, an organization focused on outreach to individuals with disabilities, to further our reach and expand our branding to the disabled community. In 2016, GettingHired recognized Comerica as a featured employer. In 2017, GettingHired conducted disability inclusion training for our Human Resources Department and others within the organization.

Comerica participates in outreach and recruitment efforts to hire undergraduate and graduate talent. We have a variety of development programs designed to help recent college undergraduate students develop the skills and experience necessary for a successful career. Representatives are on campuses in the spring and fall across several of our primary geographical markets.

Outreach to Historically Black Colleges and Universities (HBCU)

In 2017, Comerica established a partnership with two HBCUs to increase our outreach to the African American student population. Comerica developed a partnership with Howard University and Florida A&M University in 2017 to further our reach and expand our brand to recruit and attract talent into our early career programs in Technology and Commercial Banking.

Comerica has an active veteran's recruitment strategy, which is communicated regularly to HR professionals, hiring managers, and executives. Several veteran-specific strategies and practices to attract veteran talent include connecting with the Veteran Leadership Network ERNG and the Veteran Market Segmentation Initiative (MSI) team for veteran referrals, implementation of veteran-friendly job qualifications, creation of a veteran-friendly recruitment handout and specific relationships with local and regional veteran

representatives. In addition, as highlighted in the [Our Company](#) section, Comerica has provided support on a national level for the Employer Support of the Guard and Reserves (ESGR). Comerica's national signing publicly emphasizes our support of Guard and Reservists and advocates for employee participation in the military.

Our Board

Comerica strives to have a diverse Board that represents the interests of Comerica's four core constituencies: its shareholders, its customers, the communities it serves and its employees. The Governance, Compensation and Nominating Committee considers diversity 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. In 2017, Comerica added one additional director who is a female.

2017 Board Composition

10 of the 11 Comerica Board members are independent.	One director is Hispanic, two are African American, and eight are Caucasian.	Three of Comerica's directors are female and eight are male.
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Our Customers

Comerica's diversity efforts also extend to our customers through our seven Comerica Market Segmentation Initiative (MSI) Outreach Group categories:

- African American
- Asian (Pacific, South Asian and Indian)
- Hispanic
- Middle Eastern
- LGBT and Allies
- Veterans and Military
- Women

Our MSI teams, which operate across our primary markets, pursue strategies to meet the banking needs of minority, female, LGBT, veterans and women business owners and professionals. The teams also establish relationships with relevant business and community leaders and organizations.

Each team is supported by business unit leaders and has an outreach budget to conduct financial education programs in partnership with relevant business associations, professional associations and nonprofit organizations serving these often "underbanked" communities. Examples include programs on lending for small businesses, cybersecurity, wealth building and basic financial literacy.

2017 Diverse Customer Outreach in Action

The Texas Women's MSI team held business networking events designed to help women professionals and business owners expand their networks and build success.	Michigan MSI teams joined with Comerica procurement to support minority business owners at the National Minority Supplier Development Council conference in Detroit. Comerica leaders shared best tips on building capital and securing contracts for new business.	California teams supported a number of professional associations, including the National Arab American Professionals Network of Orange County (NAAPOC), supporting cultural interests and building relationships.
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In 2017, 19 MSI teams were operating across our markets. The efforts of our MSI teams in total garnered more than \$300 million in new account openings from business referrals.

Supporting our Customers

MSI teams host special events where business owners and professionals can network and get information that supports their business and personal financial success. Examples include invitations to the 23rd Annual Negro Leagues Tribute Game at Comerica Park and an exclusive networking event for North Texas businesswomen.

Our Community/Employee Involvement

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

Our volunteer programs support objectives for success by improving the lives of individuals, groups and the communities in which we do business through volunteerism, building and managing relationships and strategic partnerships. Our volunteers give generously of their time and talent, by participating on boards, conducting financial literacy training and providing service to help make local communities better places.

We strive to be a community leader in our key markets through our colleagues' volunteering and board participation. Comerica's employee volunteer program provides opportunities for colleagues to give back to the community. Each primary market has a Local Community Involvement Coordinator, who works with our National Employee Volunteer Program Manager to ensure that volunteering goals are met and that we follow best practices. We set annual goals for volunteer hours in each community where we operate. Managers lead by example and encourage other colleagues to do the same.

Supporting our Community



Comerica Cares volunteers and families working with Habitat for Humanity in Dallas.



Comerica Cares volunteers support The Children's Center in Detroit sharing their creativity by helping create a new library.



Over 50 Comerica Cares volunteers and their families in San Jose prepare for a coastal cleanup of the Guadalupe River.

Since 2011, our Donate 8 initiative has challenged colleagues to spend eight hours or more of personal time per year on community service activities. In order to encourage colleagues to record their community volunteer hours, we updated the program in 2014 to provide incentive for participation. In 2017, colleagues who recorded a minimum of eight hours were entered into a drawing to win a gift card, and those who recorded over 100 hours received signed certificates of appreciation from their respective market presidents. We also encourage senior managers to participate on community nonprofit boards.

2017 Comerica Employee Volunteering Numbers

67,967	2,039	\$1.64 million
Hours	Volunteers	Approximate worth of employee volunteer time

Last year, our company-wide goal was 64,000 employee volunteer hours — equivalent to eight hours per employee. Approximately 26 percent of our employees recorded volunteer hours in 2017.

Volunteerism has been an important priority for Comerica for many years. As a result, we have been recognized for our leadership in volunteerism outreach and program efforts.

<i>Our Recognition</i>	
Financial Services Roundtable-Corporate Responsibility Leadership Award	Comerica was named one of the top financial service companies for Corporate Social Responsibility by the Financial Services Roundtable (FSR), a leading financial services trade association. Comerica was one of 28 companies to receive the FSR Corporate Social Responsibility Leadership Award for its leadership to improve communities and improve Americans' financial literacy skills.
Points of Light-The Civic 50 List	The Civic 50, an initiative of Points of Light, the world's largest organization dedicated to volunteer service, recognizes a list of the top 50 most community-minded companies in the United States, including Comerica. The award sets a national standard for superior corporate citizenship and showcases how companies can use their time, skills and other resources to improve the quality of life in the communities where they do business. It is the third time Comerica has been named to this prestigious list since 2012 and our first listing in consecutive years.

Please review the Employee Sustainability Engagement section of the [2017 Comerica Corporate Responsibility Progress Report](#) for more details on how we engage our employees on the topic of environmental sustainability.

Our Suppliers

Comerica is committed to supporting the communities we serve. This includes an ongoing effort to enhance local and regional business success through proactive efforts to engage with diverse suppliers. Our Supplier Diversity Program provides capable, diverse businesses with an equitable opportunity to supply us with goods and services.

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

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

We establish annual supplier diversity spend goals based on our projected discretionary spend. We track spending with our diverse suppliers quarterly to ensure we meet our goals. Our Corporate Purchasing Department includes a senior-level Supplier Diversity Manager, who works with regional contacts to identify and support diverse vendors. For contracts originating in 2017, our goal was to spend \$57.4 million of this discretionary spend with diverse suppliers. This goal was lower than our 2015 and 2016 goals due to overall expense reduction initiatives.

<i>Diverse Supplier Discretionary Spend</i>			
Year	2015	2016	2017
\$ Millions	110.0	102.4	64.1
Discretionary Spend Goal Progress	Goal exceeded all three years		

We also ask our Tier 1 strategic supply partners, as identified by our business units, to support our supplier diversity initiatives by achieving, at minimum, 25 percent diverse sourcing from their suppliers. We monitor their performance during regularly scheduled

business reviews. We achieved \$19.5 million through our Tier 2 supplier diversity reporting in 2017, a decrease compared to our 2016 spend, consistent with our overall ongoing expense reduction efforts.

Comerica's standard Request for Proposal (RFP) language for sourcing opportunities includes questions concerning supplier diversity. Comerica's National Supplier Diversity Manager reviews supplier lists for each sourcing opportunity to ensure that, where possible, diverse firms are included. In 2017, 49 percent of RFPs tracked included diverse suppliers. Of that, 13 percent were awarded to diverse suppliers.

2017 Supplier Diversity Recognition

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

Recognized by Women/Minority Business News as Corporate 101: America's Most Admired Corporations for Supplier Diversity

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

Outreach to Veteran-Owned Businesses

During 2017, we increased our outreach to veteran-owned businesses by partnering with the National Veterans Business Development Council (NVBDC). Comerica participated in the Veterans Business Matchmaker hosted by the Federal Reserve of Chicago-Detroit Branch. In addition, Comerica participated in the NVBDC's Annual Conference held in Detroit, and hosted an informational table to talk with Veteran Business Enterprises about how to do business with Comerica.

To support access to our business for women-owned firms, we partner with the Great Lakes Women's Business Council and the National Association of Women Business Owners Greater Detroit Chapter in Michigan, among other regional chapters. Comerica staff serve on boards and committees for many of these organizations and we participate in trade fairs and networking events that help diverse business owners access our procurement decision-makers. During 2017, we also co-hosted training seminars for diverse businesses with the Michigan and Dallas/Fort Worth MSDCs and held webinars for our women-owned suppliers.

Michigan Minority Supplier Development Council



Comerica is a corporate member of the Michigan Minority Supplier Development Council (MMSDC), and was honored to host the kick-off-session for the MMSDC's Women's Mastermind Sessions in March. More than 40 women-of-color entrepreneurs attended the event at Comerica's Detroit headquarters to hear from the Mastermind Sessions facilitator Dr. Joe Johnson.

Comerica hosted the APACC/Comerica Symposium in August with Peter Sorrentino, Comerica's Chief Investment Officer, and Tel Ganesan, Managing Director of Kyba Xcelerator and President of TiE Detroit, an entrepreneurship group. Sorrentino covered current economic trends with a focus on the changing nature of the U.S. global trade and its impact on currencies, commodities and productivity, while Ganesan focused on the impact of economic trends on the business owners' day-to-day.

Comerica Supplier Diversity in Action

The National Minority Supplier Development Council's Annual Conference was held in Detroit in 2017. Gloria Oldani, Senior Vice President Purchasing, facilitated a Chief Purchasing Officer (CPO) panel discussion on "Insights from the CPO Suite: The Financial Services Supply Chain of the Future" as a part of the symposium hosted by the Financial Services Roundtable on Supplier Diversity. This symposium attracted more than 120 MBE attendees and featured CPOs from Guggenheim Partners, Keycorp, Fifth Third Bank, and the PNC Financial Services Group.



ADDITIONAL INFORMATION

Key Statistics Table

Italicized numbers indicate minor revisions to previously reported numbers. See footnotes for additional information on calculation methodologies and explanations of revisions.

KEY STATISTICS	2012	2013	2014	2015	2016	2017
SOCIAL IMPACTS						
Market Presence						
Number of ATMs	640	635	639	637	606	589
Number of U.S. banking centers	488	482	480	476	457	437
Community Development						
Community and economic development loans (Millions \$)	174	512	354	342	380	439
Low-income housing tax credit investment deals closed (Millions \$)	69	74	74	78	75	75
Historic rehabilitation tax credit investment (Millions \$)	1.2	6.5	0	2	0	0
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent)	N/A	N/A	10	7	6	6
Number of micro-enterprise loan funds supported	29	25	29	27	29	29
Supplier diversity spend (Millions \$) ¹	70	70	67	110	102	64
EMPLOYEES						
Number of Workers						
Total Employees- Full-time equivalents (FTE) ²	9,035	8,948	8,876	8,880	7,960	7,999
Employee Diversity						
Women employees (Percent of total employees)	N/A	N/A	N/A	67.1	67.3	66.5
Women Officials and Managers (total number) ³	N/A	N/A	N/A	1,251	728	725
Women Professionals (total number) ³	N/A	N/A	N/A	1,498	1,415	1,497

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Women Other (Administrative Support, Sales Worker, and Service Worker) (total number) ³	N/A	N/A	N/A	3,341	3,298	3,198
Racial/Ethnic Minority Population employees (Percent of total employees)	N/A	N/A	N/A	38.5	38.2	39.1
Racial/Ethnic Minority Officials and Managers (total number) ³	N/A	N/A	N/A	662	328	343
Racial/Ethnic Minority Professionals (total number) ³	N/A	N/A	N/A	834	780	840
Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number) ³	N/A	N/A	N/A	1,996	1,979	2,007
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program(Percent) ⁴	N/A	N/A	85	80	89	88
Bronze-level certified colleagues (number of colleagues)	N/A	N/A	5,028	5,345	5,167	5,301
Silver-level certified colleagues (number of colleagues)	N/A	N/A	3,536	4,081	3,984	4,180
Gold-level certified colleagues (number of colleagues)	N/A	N/A	2,373	3,031	3,065	3,332
Platinum-level certified colleagues (number of colleagues)	N/A	N/A	1,237	1,555	1,688	1,961
Employee Benefits						
Services provided through Comerica's Employee Assistance Program (# of instances)	N/A	4,570	4,499	3,854	4,671	4,433
Employees receiving tuition assistance (total number)	132	248	226	212	179	143
Value of tuition assistance received (\$)	852,680	886,599	801,200	814,508	686,694	529,993
Leadership Development Program (number of graduates) ⁵	47	49	44	29	29	—
Emerging Leaders Program (number of graduates) ⁵	NA	NA	NA	NA	NA	47
Employee Awards (number of monetary awards to employees)	2,657	2,746	2,571	2,270	2,196	2,350
Value of Employee Awards (\$)	378,000	392,000	391,000	387,000	372,075	385,843
COMMUNITY						
Charitable gifts and corporate contributions (Millions \$)	9.1	8.4	8.8	8.8	8.1	8.0
Employee United Way contributions (Millions \$)	2.0	2.2	2.1	2.2	1.7	1.7

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Employee time volunteered (hours)	71,000	72,186	73,970	73,800	59,350	67,967
Number of employee volunteers	2,300	2,514	2,543	2,853	2,286	2,039

¹ The reduction in supplier diversity spend in 2017 (vs. 2016) was primarily related to a decrease in contingent labor spend with our two contingent labor suppliers who are diverse suppliers.

² As reported in Comerica's 2018 10-K Annual Report (page F-109).

³ EEO-1 categories used for breakdown of Women and Racial/Ethnic Minority employee numbers.

⁴ MDA level listings are cumulative. If a colleague has been certified at the Platinum level, he/she is also counted in the bronze, silver and gold certification level.

⁵ Since 2016, Comerica's Leadership Development Program is offered on a bi-annual basis (current program started Q1 2018). Our new bi-annual Emerging Leaders Program began in Q4 2017 with completion in Q1 2018).



Comerica Bank:
MEMBER FDIC. EQUAL OPPORTUNITY LENDER.

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