

# 2019



## Corporate Responsibility



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



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, in particular the energy industry; 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; the effects of stringent capital requirements; and the impacts of future legislative, administrative or judicial changes to tax regulations); financial reporting risks (changes in accounting standards and the critical nature of Comerica’s accounting policies); 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 (changes in general economic, political or industry conditions; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events; impacts from the COVID-19 global pandemic; 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 12 of Comerica’s Annual Report on Form 10-K for the year ended December 31, 2019 and “Item 1A. Risk Factors” beginning on page 60 of Comerica’s Quarterly Report on Form 10-Q for the quarter ended March 31, 2020. 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 document or in any documents, Comerica claims the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995.

# TABLE OF CONTENTS

Report Section	ESG Impact Topic	Page Number
<b><u>Infographic: Corporate Responsibility at Comerica</u></b>	—	4
<b><u>Our Leaders on Corporate Responsibility</u></b>	—	5
<b><u>How Comerica Demonstrates Corporate Responsibility</u></b>	—	6
<b><u>Comerica's Coronavirus Response</u></b>	—	7
<b><u>Responding to Racial Injustice</u></b>	—	8
<b><u>Our Company</u></b>	—	9
<u>2019 Corporate Responsibility Awards and Recognition</u>	—	10
<b><u>Customers</u></b>	—	11
<u>Privacy &amp; Information Protection</u>	YES	12
<u>Innovation &amp; Technology</u>	YES	13
<u>ESG-Related Lending &amp; Investment</u>	YES	14
<b><u>Responsible Business</u></b>	—	15
<u>Anti-Corruption, Ethics &amp; Countering Bribery</u>	YES	16
<u>Reputation</u>	YES	17
<u>Business Risk Management</u>	YES	18
<u>Transparency</u>	YES	19
<u>Public Policy &amp; Government Relations</u>	YES	19
<b><u>Colleagues</u></b>	—	20
<u>Talent Attraction, Development &amp; Retention</u>	YES	21
<u>Employee Engagement</u>	YES	22

Report Section	ESG Impact Topic	Page Number
<b><u>Diversity &amp; Inclusion</u></b>	—	23
<u>Diversity &amp; Inclusion</u>	YES	24
<u>Board Diversity</u>	YES	25
<b><u>Environment</u></b>	—	26
<u>Climate Change Impacts</u>	YES	27
<u>Energy &amp; Emissions</u>	YES	27
<u>Environmental Resource Management</u>	YES	28
<u>Environmentally-Beneficial Lending</u>	YES*	29
<b><u>Community</u></b>	—	30
<u>Financial Inclusion &amp; Financial Education</u>	YES	31
<u>Community Investment &amp; Development</u>	YES	32
<u>Volunteerism &amp; Philanthropy</u>	YES	33
<b><u>Additional Information</u></b>	—	34
<u>Key Statistics Tables</u>	—	35
<u>Reporting Methodology</u>	—	50
<u>GRI Standards Content Index</u>	—	51
<u>SASB Content Index</u>	—	63

\* Environmentally-Beneficial Lending is part of the ESG-Related Lending & Investment Impact Topic

# Corporate Responsibility at Comerica

 **\$923** MILLION

in green loans and commitments

 **27%**

of Comerica's Board of Directors are racial/ethnic minorities and **27%** are women

 **237,000**

meals provided in connection with our community Shred Day events, which securely recycled over 882,000 pounds of paper

**32%**

of colleagues have served Comerica for more than **15 years**

**TOP 100**

ranking from *Newsweek*, *Barron's*, and Corporate Knights on sustainability

**\$52** MILLION

in annual spend with diverse suppliers

 **OVER \$8.4** MILLION

donated to charitable organizations via more than 1,400 grants/sponsorships

 **OVER 71,300** HOURS

of volunteer time donated to nonprofits by Comerica colleagues, worth **over \$1.8 million**

 **OVER 180**

applications migrated to the cloud to provide more secure, cost-effective and efficient data storage

 **OVER 35,700**

low- and moderate-income individuals reached by financial education training events at over 1,067 Comerica-sponsored events

 **31%** REDUCTION

in real estate energy consumption since 2012

 **40%** of Comerica's U.S. workforce are racial/ethnic minorities

 **65%** of Comerica's U.S. workforce are women

 **GOLD-LEVEL** Veteran-Friendly Employer through the Michigan Veteran Affairs Agency

Data provided is for 2019, and all comparisons are to 2018 unless otherwise noted.

## Achieved 100% of 2020 Environmental Goals vs. 2012 Baseline

**48.1%** REDUCTION IN GHGs

**GOAL ACHIEVED IN 2016**

as of 2019 vs. 2020 goal of 20%

**33.3%** REDUCTION IN WATER CONSUMPTION

**GOAL ACHIEVED IN 2019**

as of 2019 vs. 2020 goal of 30%

**30.3%** REDUCTION IN WASTE TO LANDFILL

**GOAL ACHIEVED IN 2015**

as of 2019 vs. 2020 goal of 20%

**56.3%** REDUCTION IN OFFICE COPY PAPER USAGE

**GOAL ACHIEVED IN 2019**

as of 2019 vs. 2020 goal of 50%

Visit [www.comerica.com/sustainability](http://www.comerica.com/sustainability) to view Comerica's 2019 Corporate Responsibility Progress Report, including the sources of data listed above and more information on our corporate responsibility efforts.

CB-270226-04 06/20





"At Comerica, being a responsible company is deeply embedded in our 170-year history and culture. Through wars, the Great Depression, the economic and political turbulence of the 20th century, the Great Recession, and now over two decades into the 21st century, Comerica Bank stands as a beacon of strength in the communities that we serve. Our long-term commitment to maintaining corporate responsibility as a top priority is reflected in the actions of our colleagues and the support we provide our customers, communities and stakeholders."

**Curtis C. Farmer**  
**Chairman, President and Chief Executive Officer**  
**Comerica Incorporated and Comerica Bank**



"Comerica's commitment to the principles of responsible business is reflected in all areas of its environmental, social and governance (ESG) performance. From diversity & inclusion to community investment and board diversity, Comerica understands that corporate responsibility is not only a business imperative, but drives value creation both now and into the future."

**Barbara R. Smith**  
**Facilitating Director, Comerica Incorporated Board of Directors and**  
**Chairman, President and Chief Executive Officer of Commercial Metals Company**



“For more than 170 years, Comerica has given back to the communities we serve. Our goal is to help people thrive and become successful by creating economic opportunity and providing much-needed resources to underserved individuals and families. We strive to raise expectations of what a bank can be.”

**Irvin Ashford, Jr.**  
**Chief Community Officer**



"At Comerica, we recognize that we can't have a thriving business without a thriving environment and that our communities, customers and colleagues rely on the resources provided by a healthy environment. That is why we work to limit our consumption of resources like paper, electricity, and water as well as drive reductions in our greenhouse gas emissions. We thank everyone who helped us exceed our 2020 sustainability goals and are focused on our greenhouse gas reduction goals for 2025 (50%), 2030 (65%) and 2050 (100%) as we continue to keep sustainability a high priority."

**J. Scott Beckerman**  
**Director of Corporate Sustainability**



“Diversity, Equity and Inclusion at Comerica is woven into the essence of who we are and how we act. Our commitment to our colleagues and customers is inclusive and is intertwined in our core values as a company. Embracing the differences amongst our colleagues and customers allows Comerica to flourish and support success for all. We are committed and stand with our communities to achieve equal justice for all.”

**Nathaniel Bennett**  
**Chief Diversity Officer and Head of Talent Acquisition**

# COMERICA'S CORONAVIRUS RESPONSE

[Table of Contents](#)

Our communities have been impacted by the extraordinary circumstances that have accompanied the 2020 global COVID-19 pandemic. Comerica has responded by taking actions to support our colleagues, customers and communities during this unprecedented time.

Colleagues	Customers	Communities
<p>Comerica raised employee compensation for colleagues with on-site roles as part of the bank's newly-established "Promise Pay" program, providing colleagues that could not work remotely up to an additional \$700 per month beginning in March through June 2020.</p>	<p>Comerica processed over 14,000 Paycheck Protection Program (PPP) loan applications with total approved loans of \$4.2 billion. Loans supported smaller organizations, with 81% of loans going to organizations with less than 50 employees (as of 5/7/2020) and 73% of the PPP loans were less than \$150,000.</p>	<p>Comerica Bank and the Comerica Charitable Foundation jointly announced an initial \$4 million community investment on March 24.</p>
<p>We also instituted additional colleague benefits due to COVID-19, including providing a new dependent and elder care stipend beginning in March through August 2020 (\$400 per month) to help cover unexpected costs, extending special circumstances pay, adding 10 paid workdays to care for individuals with COVID-19, covering the cost of COVID-19 testing, and providing no cost telehealth and other health care benefits.</p>	<p>We supported our business customers who have been impacted by COVID-19 with various loan payment deferral and fee waiver options.</p>	<p>A second \$4 million investment into the communities that Comerica services was announced on May 7.</p>
	<p>Personal customers experiencing financial difficulty as a result of COVID-19 are supported with fee and penalty waivers, loan deferrals and other options that best support their circumstances.</p>	<p>Comerica provided its support via contributions to Community Development Financial Institutions (CDFIs) and other nonprofits that support micro-sized businesses, as well as community programs supporting those impacted by COVID-19.</p>

At Comerica Bank, the well-being of our customers, employees and communities remains our priority. For more than 170 years, we have supported our customers through the hardships of world wars, the Great Depression, the Great Recession and many other monumental challenges, and we will continue to do so. For updates on our COVID-19 response, visit the [Newsroom](#) on Comerica.com.

*(Information as of 6/4/2020 unless otherwise noted)*

In response to the homicide of George Floyd on May 25, 2020, Comerica took decisive actions to ensure that our colleagues and communities understood Comerica's position on this senseless death and the greater issue of racial injustice.

## Taking Action: Awareness + Understanding + Inclusion = Cultural Competency

Comerica Bank Chairman & CEO, Curt Farmer, released a message to all of our colleagues communicating his decisive stance on racial injustice and assuring our colleagues that Comerica stands with our Black community.

Our Chief Diversity Officer (CDO) met with 40 bank officers representing our seven Employee Resource Network Groups and three of our Local Diversity Awareness Roundtables to hear concerns, reactions and testimony and provide feedback on how they wanted to see us respond.

We introduced our Diversity Dialogue series, the first of many conversations on Racial Injustice in the Black community led by our CDO and CEO featuring the testimony of our colleagues and leaders.

We announced the bank would close at 2 p.m. local time on June 19, 2020, in observance of Juneteenth.



*"I think it is really incumbent upon me as your CEO and my leadership team to lead a diverse and inclusive environment for all of our employees. At the same time, I think it is critical for me to speak out, and for all of us to speak out, against racial injustices in the Black community as well as racial injustices more broadly defined." - - Curt Farmer*

Comerica managers were provided details and resources on how to conduct sessions on Racial Injustice with their teams and how those teams can help drive justice for all.

Our Local Diversity Awareness Roundtables launched a series on "How to be an Ally" to demonstrate how to be an active ally against racial injustice.

We will offer ongoing virtual business boot camps throughout our five-state footprint in 2020 to provide under-resourced communities with the technical support and business acumen to help improve the long-term viability of their businesses.

Comerica announced a \$1 million commitment over four years to the National Business League to launch the Black Capital Access Program, combining financial resources and technical assistance to support Black-owned businesses.

For additional information on Comerica's long-standing commitment to diversity, equity and inclusion, see the [Diversity & Inclusion](#) section of this report and our stand-alone [Diversity & Inclusion Report](#) on Comerica.com.

*(Information as of 6/19/2020)*

# 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 helping people and businesses be successful. In addition to Texas, Comerica 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.

Visit [Comerica.com](http://Comerica.com) and read our [2019 Comerica Annual Report](#) for more details about Comerica.

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



[KEY METRICS](#)

[ESG IMPACT ASSESSMENT REPORT](#)

## STAKEHOLDER ENGAGEMENT AND ESG IMPACT ASSESSMENT

Comerica details how we assess environmental, social and governance (ESG) issues, including how we engage with stakeholders, our impact assessment process, and our impact matrix, in our ESG Impact Assessment Report.

## UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGs) ALIGNMENT TO COMERICA IMPACT TOPICS

To review how Comerica's Impact Topics align to the UN SDGs, review pages 17-19 in our [2018 Comerica Corporate Responsibility Report](#).

# 2019 CORPORATE RESPONSIBILITY AWARDS AND RECOGNITION

[Table of Contents](#)

Comerica is pleased to be recognized for our work as a responsible company. For more details, click on any of the highlights below:

<p><u>Ranked No. 40 in Global 100 Most Sustainable Corporations in the World by Corporate Knights</u></p>	<p><u>Placed 9th in Newsweek's inaugural ranking of America's Most Responsible Companies</u></p>	<p><u>Selected as a finalist for Gartner's prestigious Eye on Innovation Award for use of Virtual Reality technology in Financial Services</u></p>	<p><u>One of Barron's 100 Most Sustainable Companies in the United States</u></p>
<p><u>Achieved perfect Score of 100 for 6th consecutive year on Human Rights Campaign Foundation's Corporate Equality Index</u></p>	<p><u>Recognition for second consecutive Climate Leadership Award from C2ES and the Climate Registry</u></p>	<p><u>11th consecutive year on the FTSE4Good Index</u></p>	<p><u>10th year of listing on the DiversityInc Top Regional Companies for Diversity list (ranked 4th in 2019)</u></p>
<p><u>Winner of the 2019 U.S. Captive Review Banking Specialist Award for captive insurance products and services which have outperformed competitors and demonstrated the highest levels of excellence</u></p>	<p><u>11th Gold-Level Veteran-Friendly Employer certified in Michigan by Michigan Veteran Affairs Agency for its extensive efforts to recruit, train and retain military veterans as of January 2020</u></p>	<p><u>"Best in Class" for Excellence in Supplier Diversity Award from the Great Lakes Women's Business Council</u></p>	<p><u>Inaugural listing on the Texan by Nature TxN20, an official ranking of 20 companies with Texas operations that have made a demonstrative commitment to conservation.</u></p>
<p><u>Impact Innovation Award in Reporting and Analytics during the Aite Group's Innovation in Cash Management &amp; Payments Forum</u></p>	<p><u>Top 50 Best Companies for Latinas to Work for in the U.S. by LatinaStyle; the ninth time Comerica has received the honor</u></p>	<p><u>Cornerstone Award for Comerica's Gift of Knowledge financial education project by Texas Bankers Association</u></p>	<p><u>Listed on The Civic 50 by Points of Light, a list of the top 50 most community-minded companies in the U.S.</u></p>

# CUSTOMERS

At Comerica, we strive to deliver experiences that exceed our customers' expectations. To achieve this on a daily basis, we work proactively to understand our customers' needs. We use our Customer Promise to guide our interactions with current and potential customers to give them the service, knowledge and experience they desire, all in an effort to raise the expectations of what a bank can be.

We provide products and services to meet the financial needs of our customers. Our three business segments, The Commercial Bank, The Retail Bank and Wealth Management, are strategically aligned to deliver the right support to meet the diversity of our customer's requirements.

We are also committed to helping small businesses grow and prosper. Our banking centers are located in areas where small business customers are concentrated. Our relationship-based approach to small business banking supports those businesses with annual revenues under \$30 million. Metrics and success highlights are included within this Customers section to feature our 2019 progress.



OVER **\$1** BILLION 

in loan originations from our small business-focused groups in 2019

**SBA** **\$128** MILLION

in Small Business Administration (SBA) loans, including government-guaranteed 7a and 504 loans in 2019

[Comerica Works- Financial Fundamentals for Business](#)

[Comerica Insights- Customer Education](#)

Our business and reputation rely on trust. Our customers' trust in Comerica is contingent on our success in safeguarding their privacy and financial information. Increasingly, this involves investing in measures to prevent unauthorized access to our information systems. We are committed to maintaining our customers' trust and continually evaluate and enhance our cybersecurity systems to safeguard customer information, protect against fraud attempts and provide a high level of safety and protection. Our industry faces many challenges due to the constantly evolving nature of security technology, with attempts to compromise our customers' privacy increasing in both frequency and sophistication. In response, we participate in a number of industry-wide initiatives to keep abreast of new fraud trends and share this intelligence with our colleagues, customers and community members, as appropriate.

Our most recent engagements with external stakeholders revealed that customer privacy and protection — defined as securing customer data, confidentiality and physical safety — is one of the most important issues and cybersecurity was identified as a topic critical to our business success. This reinforces the fact that failure to properly manage these issues could result in significant risks to Comerica, including financial losses, reputational risk and fines or penalties due to non-compliance. Accordingly, privacy and information protection are managed and discussed together in this section. For further insight into this issue, see Item 1A (Technology Risks, page 15-16) in our [2019 Annual Report](#). Privacy and information protection, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Enterprise Information Protection Framework.

More details on how we manage Privacy and Information Protection at Comerica is available in our [2018 Comerica Corporate Responsibility Report \(pages 22-24\)](#).

[Comerica's Security  
Commitment](#)

[COMERICA FRAUD  
CENTER](#)

[KEY METRICS](#)

[ELDER FRAUD  
INFORMATION](#)

[CYBER SECURITY AND  
FRAUD EDUCATIONAL  
RESOURCES](#)

**OVER 180**  
 applications migrated to the cloud to provide more secure, cost-effective and efficient data storage

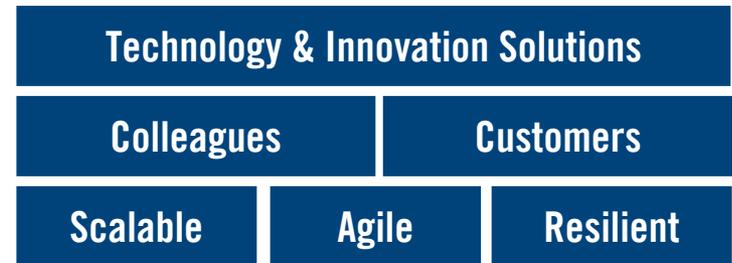


At Comerica, we utilize technology and innovation to enhance our organization and strengthen our relationship-based approach to banking. Comerica’s technology teams partner with our lines of business to understand the marketplace and offer data-directed products to help meet the needs of our customers. Our transformational efforts are creating a more data-driven, digitally-centric bank built on a foundation of continuous investment in key technologies and capabilities.

Technology drives better business outcomes when we strategically empower our colleagues to effectively utilize solutions. By focusing our efforts on improving performance across our organization, we equip our workforce with new digital technologies and provide multiple avenues for training and deepening colleague capabilities. We supplement this approach by seeking colleague feedback through opportunity discovery sessions and leveraging intelligent automation.

Comerica’s process improvement discipline furthers innovative solutions, accelerating applications with the most business value. Rapid adoption of cloud computing has also allowed us to become more scalable, resilient and agile in the development and deployment of solutions for both colleagues and customers.

Cybersecurity is an essential component of our technology strategy, and we work to keep Comerica and our customers secure. We focus on prevention and protection from issues that threaten customer privacy and security (see [Privacy & Information Protection](#) for more details). By concentrating our technology investments on our insight-based product and service offerings and by increasing our efficiency across technology operations, we work to continually raise customer expectations in an increasingly digital world.



**KEY METRICS**

**EXCEPTIONAL ACADEMY TECHNOLOGY PROGRAM**

# ESG-RELATED LENDING & INVESTMENT

[Table of Contents](#)

ESG-related business activities refer to the ways that a business enhances society through its products, people and practices. At Comerica, ESG-related business activities include supporting diverse segments of our markets, lending to environmentally beneficial companies and projects, and our community investment and development work.

A common alignment of ESG-related business activities can be found in frameworks such as the United Nations Sustainable Development Goals, as discussed in Comerica's 2018 Corporate Responsibility Report and our ESG Impact Assessment. Comerica's business activities support the advancement of these and other ESG-related goals and we acknowledge the growing interest in this topic from a range of stakeholders, including customers and investors.

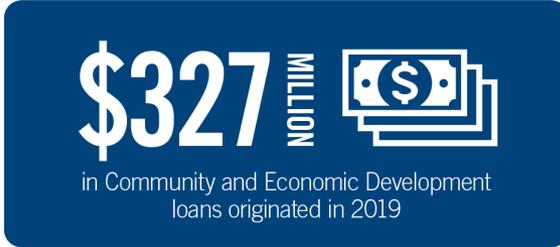
For details on how we support ESG-Related Lending & Investment at Comerica, refer to the report section links provided below.



**ENVIRONMENTALLY BENEFICIAL LENDING**



**COMMUNITY INVESTMENT/ DEVELOPMENT**



**MARKET SEGMENTATION INITIATIVE (MSI) TEAMS**



# RESPONSIBLE BUSINESS

Comerica's commitment to integrity is fundamental to our 170-year history and business success.

We exemplify our Core Values in our daily interactions with customers, and maintain high standards of ethics and accountability for our Board, leadership and colleagues. Our day-to-day operations are closely linked to our corporate responsibility efforts through our focus on ethics, good governance and responsible business practices, which benefit all of our stakeholders.



The following sections of this report provide examples of our strong corporate governance approach:

- Anti-Corruption, Ethics and Countering Bribery efforts create accountability at all levels of the organization;
- Reputation describes the collective perception of our company based on our conduct and business practices;
- A holistic approach to Business Risk Management, that helps us focus on long-term sustainable performance; and
- Public Policy and Government Relations efforts, which establish how we comply with and guide development of regulation in our industry to promote good business practices and customer stewardship.

Metrics and success highlights are included within this Responsible Business section to highlight our 2019 progress. For more information on our corporate governance guidelines, management and performance, see the links below.

[CORPORATE GOVERNANCE](#)

[2019 ANNUAL REPORT](#)

[2020 PROXY STATEMENT](#)

To remain one of the leading financial institutions in the United States, we strive to instill trust and confidence in our customers, colleagues, shareholders and business partners by demonstrating the highest standards of ethics and integrity.

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

In addition, money laundering, bribery and corruption pose significant potential risks to Comerica, such as damaging our business and reputation or provoking regulatory scrutiny. Countering the potential for such activity is a high priority. Since certain lines of business and product offerings inherently carry more risk of corruption, Comerica's Bank Secrecy Act/Anti-Money Laundering risk assessment considers risk factors, such as customer geography and demographic information, as well as mode of interacting with customers (i.e., in-person or online) to reduce risk.

For more details on our anti-corruption, ethics & countering bribery efforts, see [Comerica's Governance page](#) on Comerica.com.

[CODE OF BUSINESS CONDUCT AND ETHICS FOR EMPLOYEES](#)

[SENIOR FINANCIAL OFFICER CODE OF ETHICS](#)

[CODE OF BUSINESS CONDUCT AND ETHICS FOR MEMBERS OF THE BOARD OF DIRECTORS](#)

[ANTI-MONEY LAUNDERING COMPLIANCE](#)

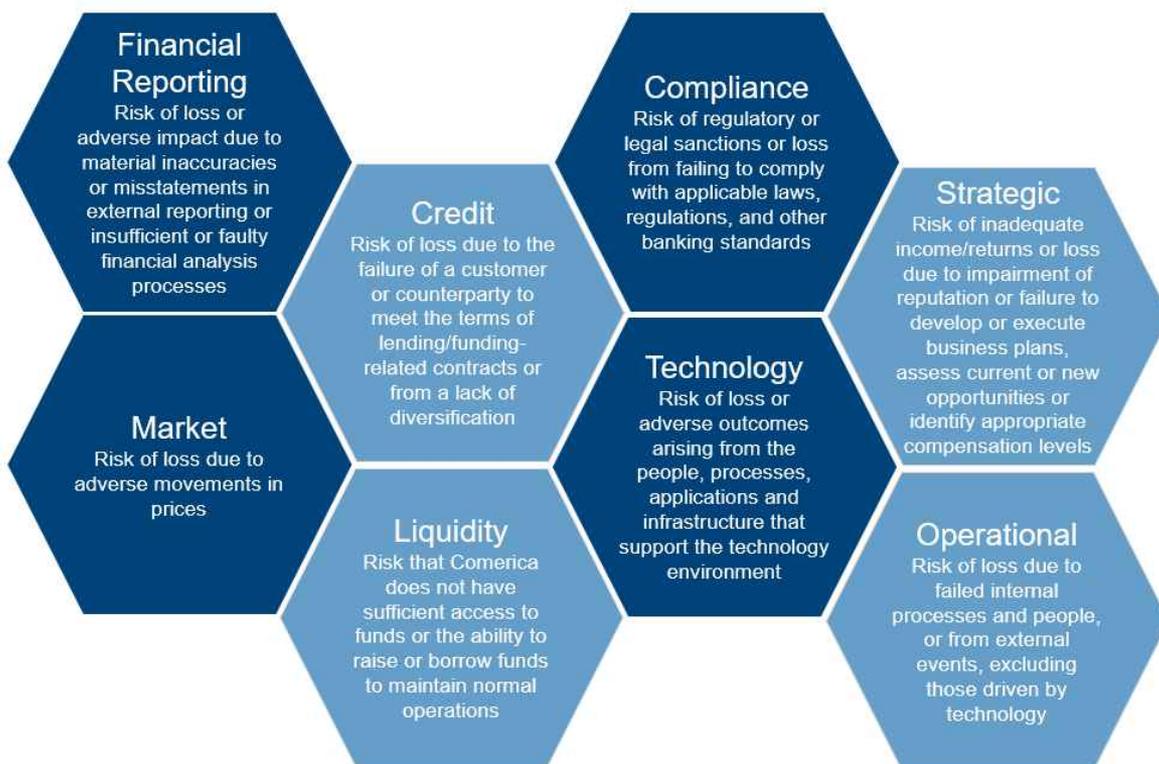
[KEY METRICS](#)

For 170 years, we've worked to earn our reputation for delivering a premium blend of service and value in the financial services industry. 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 and we must earn that trust every day.

Given our mission to be the highest performing, most respected and most desired bank in the markets we serve, we understand we can't be successful without our strong reputation. Our reputation is impacted by numerous internal and external factors, ranging from customer service and community development to corporate governance and our diversity. In this way, reputation is embodied in virtually every aspect of our business. By living our Core Values, we put ourselves in the best position to maintain our strong reputation within our industry and in the markets we serve.



Risk management has always been a priority at Comerica. Given the pace of change in our current world, the rapidly evolving regulatory expectations and the highly competitive business environment, it is more important than ever. Our consistent and conservative approach to banking has fostered a robust risk management culture at Comerica. This makes us strong and resilient, benefiting our stakeholders and our business. Our approach is not to eliminate risk, but to understand, manage and provide careful consideration for the risks we elect to accept. In this way, we appropriately balance revenue targets with our corporate strategy, risk appetite, mission and Core Values.



Comerica's risk management practices are guided by the Enterprise Risk Management Framework, which is approved annually by the Enterprise Risk Committee (ERC) of our Board of Directors. The framework provides a common platform to evaluate all risks and mitigating controls. It also aggregates granular risks across the organization for a broader understanding of our corporate risk profile. The 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.

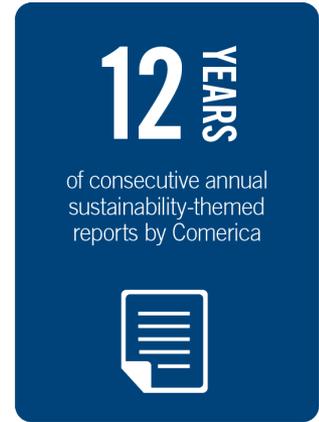
For more on risk identification and management, see our [2019 Annual Report](#) and our [2018 Comerica Corporate Responsibility Report](#).

# TRANSPARENCY

[Table of Contents](#)

Providing robust disclosures of financial, environmental and social metrics is a tenet of our corporate responsibility reporting. Transparent disclosure instills confidence and trust in our company, and our stakeholders view it as one of the more significant ESG topics for our business. Comerica also provides extensive information on [Comerica.com](#), including investor presentations, annual and quarterly reports, our proxy statements and [news releases](#). We also comply with numerous disclosure obligations, such as those found in our [SEC filings](#) and other regulatory filings. We are committed to both transparent disclosure of information and the implementation and maintenance of systems to obtain and verify information that stakeholders desire.

Since 2008, Comerica has fostered ESG transparency by providing annual updates on our commitment to corporate responsibility. We have consistently used the GRI Standards and frameworks, which identify the most significant issues for Comerica and our diverse stakeholders. Our [Reporting Methodology](#) provides additional details on our ESG disclosure approach.



# PUBLIC POLICY & GOVERNMENT RELATIONS

Legislation passed at the state and federal levels of government can have a big impact on the products and services offered by Comerica. As such, we closely monitor the development of public policies that directly affect our business 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 banking industry trade associations to advocate on behalf of the regional banking industry.

Also, Comerica's Political Action Committee (PAC) annually solicits contributions from eligible employees and makes bipartisan contributions — in compliance with local, state and federal election laws — to political candidates and committees who understand and support Comerica's pro-banking, pro-business philosophy. All political contributions and guidelines are developed by the Government Relations Department and approved by a separate PAC Board comprised of senior executives from across the company. Comerica PAC contributed \$135,000 to political candidates and committees in 2019. For more details, visit the [Political Activities and Contributions](#) section of Comerica.com.

## KEY METRICS

# COLLEAGUES

Banking is a business that relies heavily on the personal relationships and the quality of service provided by employees. And, one of Comerica's strengths 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. We offer competitive wages and benefits and are committed to providing a healthy, safe and engaging working environment for all. To help build trust and loyalty, we strive to communicate regularly, openly and honestly with colleagues, and to offer opportunities for growth through our learning and development programs. We do this to attract and retain top talent, which in turn provides our customers with the relationship banking experience they deserve.



Metrics and success highlights are included within this Colleagues section to feature our 2019 progress.

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

**- Comerica's Colleague Promise**

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 facilitating talent management reviews.

## Comerica Careers

 OVER **9,300**

skills-based courses offered to Comerica colleagues in 2019

**32%**



of colleagues have served Comerica for more than 15 years

**Attracting New Colleagues:** Comerica measures the success of our talent acquisition strategy on speed and quality of acquisition, diversity of our new colleagues, retention, and overall performance metrics. Each of these metrics is tracked for each of our key business lines. Sourcing strategies and support structures are modified to ensure that performance targets are met consistently.

**Developing Colleagues:** We have created internal programs to support the development of our colleagues, including our internal Leadership Development and Emerging Leaders programs, Com-Tech college courses to help re-skill our Technology colleagues, a Managing Essentials Certificate series for our managers, and organizational change management learning for all colleagues.

**Retaining Colleagues:** In addition to direct pay, health and welfare, and retirement benefits, Comerica provides a wide range of additional programs and special services to help colleagues meet their personal needs and goals. In 2019, Comerica added Anytime Benefits, which provide additional auto/home insurance, pet insurance/pet discount program, ID theft protection, student loan refinancing and long-term care insurance options for which colleagues can apply at any time during the year.

KEY METRICS

OUTREACH TO VETERANS

Comerica operates in a dynamic and competitive industry, which makes engagement of colleagues critical to success. We find engaged employees to be higher performing and more productive. Open lines of communication between colleagues and leaders are an integral part of our culture. We believe strongly that this direct relationship assists us in maintaining a great work environment, one that is collaborative and in which colleagues are treated with dignity and respect. We also know that employees can be inspired to work for purpose-driven organizations with which they share values. Also, employee involvement is a powerful driver of engagement as colleagues become active participants in our diversity and environmental sustainability efforts, and in supporting our communities through volunteerism.

## Sustainability Engagement

We engage colleagues by harnessing their enthusiasm and commitment to drive our environmental sustainability efforts in a broad range of areas from making green loans to recycling office supplies. We engage and educate our colleagues on sustainability through corporate intranet communications and discussion boards, green office teams, sustainability-focused work groups and training. New hires are required to complete mandatory sustainability awareness training, with 100 percent of Comerica's 2019 new hires completing the course.



**482**

Colleagues enrolled in the MSA Program in 2019, a 52% increase over 2018 participation

A cornerstone of our engagement on sustainability is Comerica's voluntary Master of Sustainability Awareness (MSA) program, which is designed to move interested Comerica colleagues from learning about sustainability, to sharing what they have learned and putting it into action. MSA engages in activities that both support Comerica as a more sustainable organization and bring sustainability to colleagues' personal lives.

## Diversity & Inclusion, Financial Education and Volunteer Engagement

Comerica employees also are engaged in diversity, volunteer and financial education activities. For more details, go to the [Diversity & Inclusion](#) section for diversity-related employee engagement or to the [Community](#) section for volunteerism, financial education, and other community-related employee engagement.

**KEY METRICS**

# DIVERSITY & INCLUSION

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 statement 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 embrace our critical role in the communities we serve.



Metrics and success highlights are included within this Diversity & Inclusion section to highlight our 2019 progress.

**10 YEARS**

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



**Officials & Managers**



**51%** Female  
**27%** Minority

**65%** 

of Comerica's U.S. employees are women

**40%** 

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

Diversity & Inclusion is a key ESG Impact Topic for Comerica and since 2017, we have shared a stand-alone comprehensive Diversity & Inclusion Report. Our most recent 2019 Diversity & Inclusion Report includes detailed information on:

- Comerica's Diversity & Inclusion vision, commitment and strategy;
- Diversity of Comerica's Board of Directors;
- Attracting, developing, educating, connecting, retaining and engaging our diverse workforce;
- Engaging with our suppliers on Diversity & Inclusion; and
- Meeting banking needs of diverse customers.

To learn more about Comerica's efforts around Diversity & Inclusion, click the Most Recent Diversity & Inclusion Report link below to view the Diversity & Inclusion report on Comerica.com.

**13**  
chapters of  
**7 Employee Resource  
Network Groups**  
that represent the interests  
of diverse communities



[MOST RECENT DIVERSITY & INCLUSION REPORT](#)

**19**  
Market Segmentation Initiative (MSI) Teams  
focused on reaching diverse customers

[KEY METRICS](#)

[COMERICA'S AFRICAN  
AMERICAN NETWORK  
ENGAGES EMPLOYEES  
AND COMMUNITIES](#)

[COMERICA HELPS  
TO BUILD HOMES  
FOR HOMELESS  
VETERANS](#)

**\$52** MILLION   
in Discretionary Spend with Diverse Suppliers -  
**Annual Goal Exceeded**

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.

2019 Comerica Board of Directors Composition		
<b>91%</b> of Comerica's Board of Directors are independent	<b>27%</b> of Comerica's Board of Directors are racially/ethnically diverse	<b>27%</b> of Comerica's Board of Directors are women

Currently (2020), Comerica's female Directors hold key Board leadership positions, including Independent Facilitating Director and Governance, Compensation and Nominating Committee chair. One of Comerica's racial/ethnic minority Directors chairs the Enterprise Risk Committee.

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.

## KEY METRICS

# ENVIRONMENT

Comerica recognizes the growing concerns and risks that climate change poses to the stability of the environmental, social and economic systems on which our societies depend. We also understand that the efficient use of natural resources is key to a sustainable future. Our [Environmental Policy Statement](#) outlines our commitment to reduce climate change business risks while identifying new business opportunities that help mitigate the impacts of rising global temperatures.



Each year, we track the progress of the environmental sustainability topics most relevant to our business, including our greenhouse gas (GHG) emissions, water, waste and paper use, environmentally-beneficial (green) lending, environmentally responsible procurement and sustainability engagement.

## LOCAL ACTS WITH GLOBAL IMPACTS EVENT

Metrics and success highlights are included within this section to highlight our 2019 environmental progress.

### Comerica's Qualitative Environmental Sustainability Goals

Reduce our impact on the environment from GHG emissions	Decrease the amount of materials consumed and business waste disposed at landfills	Use our water resources wisely	Raise the environmental performance of the products and services we purchase	Seek and report on green lending opportunities that meet Comerica's credit standards
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Comerica's quantitative environmental sustainability goals are provided in the [Energy & Emissions](#) and [Environmental Resource Management](#) sections.

Since 2007, we have annually disclosed our emissions reduction strategy and efforts through CDP's climate change questionnaire. We have been recognized by CDP for our performance and leadership seven times. See our most recent [CDP Response](#) for more information on our climate change strategy, how the company is impacted by physical and business transition risks, and our recent progress in addressing climate change risks and opportunities. Our CDP Response addresses key elements of the Task Force for Climate-Related Financial Disclosure (TCFD) recommendations. Climate-related environmental data is also included in the [Key Metrics Table](#) in this report.

## ENERGY & EMISSIONS

1st Generation GHG Goal:  
15% by 2015\*

**GOAL  
ACHIEVED  
IN 2013**

2nd Generation GHG Goal:  
20% by 2020\*\*

**GOAL  
ACHIEVED  
IN 2016**

3rd Generation GHG Goals:  
50% by 2025, 65% by 2030,  
and 100% by 2050\*\*

**48.1%  
REDUCTION  
AS OF 2019**

\* Base year 2008

\*\* Base year 2012

To actively reduce climate change risks associated with our operations, we focus our efforts on two key areas: reducing energy use and reducing GHG emissions. In addition to multiple environmental benefits, there are also business benefits including creating a more desirable workplace, improving colleague retention and attraction, customer appeal and company profitability.

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 equally important to our bottom line as energy is one of Comerica's most significant corporate operating expenses. For more details on Comerica's 2019 energy consumption, GHG emissions (Scope 1-3) and reduction initiatives, refer to our most recent [CDP Response](#). For more details on our management approach, review the [2018 Comerica Corporate Responsibility Report](#).

[KEY METRICS](#)

[COMERICA HONORED WITH SECOND  
CLIMATE LEADERSHIP AWARD](#)

We are committed to managing resources wisely by minimizing operational waste and reducing our water usage. Refer to our [2018 Comerica Corporate Responsibility Report](#) for more details on how we manage paper and water consumption and waste generation.

## PAPER

We track all paper purchases across the bank, including office copy paper, envelopes, rolled paper, statements, letterhead, marketing brochures and business cards. Our focus has been on implementing a variety of technology enhancements and providing ongoing colleague education to reduce paper consumption.

## WASTE

We track our landfilled and recycled general office waste through our corporate-wide waste vendor. Comerica has three main solid waste streams: paper, electronics and general office. We also track other recycled items (cardboard, pallets and universal wastes). Our strategy is to continue auditing facilities to identify sites where we can reduce the size of waste-to-landfill containers, reduce the frequency of landfill container collection and increase colleague recycling programs.

## WATER STEWARDSHIP

Water stewardship is a priority for Comerica, particularly in light of our presence across locations in both water-abundant and water-stressed regions. Our management approach continues to focus on using water more efficiently and closely monitoring our water consumption and costs.

**56.3%**  
REDUCTION  
IN OFFICE COPY  
PAPER USAGE

GOAL  
ACHIEVED  
IN 2019

as of 2019 vs. 2020 goal of 50%

**KEY METRICS-  
PAPER/WASTE**

**30.3%**  
REDUCTION  
IN WASTE TO  
LANDFILL

GOAL  
ACHIEVED  
IN 2015

as of 2019 vs. 2020 goal of 20%

**COMERICA'S RECORD BREAKING  
SHRED DAY CAMPAIGN**

**33.3%**  
REDUCTION  
IN WATER  
CONSUMPTION

GOAL  
ACHIEVED  
IN 2019

as of 2019 vs. 2020 goal of 30%

**KEY METRICS-  
WATER**

At Comerica, we recognize our sustainability influence goes well beyond our own footprint. One of the most impactful things we do is to provide financial services to those businesses driving a more sustainable economy. By working with companies involved in environmentally beneficial industries and projects, we are able to support the sustainability efforts of our customers. In 2019, we coded \$923 million in loans and commitments to environmentally-beneficial industries and projects. For details on our environmentally-beneficial (green) loan categories and procedures, refer to pages 76-77 of [Comerica's 2018 Corporate Responsibility Report](#).

## KEY METRICS

## COMERICA SUPPORTS ROLE OF WOMEN IN ENVIRONMENTAL INDUSTRIES

*Environmentally beneficial loans and commitments by loan code category (% of total environmentally beneficial loans and commitments by dollar amount)\**



\* Data as of 12/31/19. The *Other Green Loans* category in this chart includes the following environmentally beneficial loan codes:

PollutionControl(6.4%)	Other Green Products and Services (3.2%)
SolarEnergy(5.0%)	Vehicle Electrification/Adv. Battery/Fuel Cell (2.7%)
WindEnergy(4.7%)	Energy Efficiency (1.8%)
GreenEng/Consult/Eval/Design (3.9%)	Smart Grid Technologies (0.1%)

# COMMUNITY

The vibrancy of the communities we serve is vital to our growth and the economic development in these communities is a key element of our mission. Our ongoing vision to assist entrepreneurs in starting and managing their businesses has been realized through initiatives, such as our support of Community Development Financial Institutions (CDFIs), Technical Assistance Providers, CRA lending, and affordable housing tax credit investments. Additionally, we partner, volunteer with and donate to nonprofit organizations in the communities where we operate to help maximize our positive impact.

Thriving communities help us succeed. Our community investment strategy is designed to create 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 through small business and community development lending programs and investments in large-scale programs which positively change the economic landscape of the communities we serve.

To highlight our 2019 progress, metrics and successes are included within this Community section as well as in Comerica's Community Update Report.



For more on Comerica's community investment and partnerships, visit the [Comerica Bank Community Update Report](https://www.comerica.com/cra) on Comerica.com.

## FINANCIAL INCLUSION

Comerica thrives when our customers are successful and our communities prosper. We can support this aim and drive shared value by providing financial services that enable customers to access their money easily, and provide vehicles to save as well as borrow. We work hard to expand financial inclusion, including improving accessibility of our banking centers, providing remote banking channels, such as Comerica Web Banking and Comerica Mobile Banking, and providing appropriate products to help 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.

## FINANCIAL EDUCATION

We want to serve as a trusted resource for financial education, especially for the unbanked and underbanked portions of the communities within our key markets. Comerica provides financial support to nonprofit organizations dedicated to developing financially literate communities, including organizations such as Project Still I Rise and the Arizona Hispanic Chamber, to teach personal finance basics to people in underbanked areas. In 2019, Comerica expanded its Comerica \$ense financial education programs to include Money \$ense, Business \$ense, Education \$ense, Sport \$ense and Elder \$ense.

Comerica's Financial Education Brigade (CFEB) is designed to meet the growing need for more financial education in our communities. This team of trained Comerica colleagues is committed to delivering on the Comerica Promise in low- and moderate-income communities in all our markets. The CFEB capitalizes on what we have been doing for years, reaching across business lines to help address critical needs in the community.



OVER **35,700**

low- and moderate-income individuals reached by financial education training events at over 1,067 Comerica-sponsored events

[KEY METRICS](#)

[COMERICA LAUNCHES FINANCIAL EDUCATION PARTNERSHIP](#)

[COMERICA SUPPORTS LITERACY IN DETROIT PUBLIC SCHOOLS](#)

[COMERICA WORKS FINANCIAL FUNDAMENTALS TRAINING](#)

## COMMUNITY REINVESTMENT ACT (CRA)

In 2019, Comerica originated \$327 million in community and economic development loans. The bank's community development strategy is a collaborative effort between Executive Management and the External Affairs Department that consists of the Chief Community Officer, External Affairs Managers, CRA Data and CRA Compliance. CRA-related guidance and recommendations are made based on feedback received from our Community Development Advisory Councils, other trusted community partners, data analysis, peer analysis, research related to current market conditions, and the results of our CRA examinations.

We require new External Affairs staff to take our in-house CRA training. Comerica also participates in peer bank meetings across our markets to benchmark our performance and share best practices in addressing CRA regulations and to achieve the greatest possible impact in our community development efforts. For more information, refer to the [Community Reinvestment Act \(CRA\)](#) 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 community development financial institutions where we operate. We also look for opportunities to fund organizations that provide technical assistance and financial education to small business.

Through investments in tax credit-financed real estate, Comerica provides a vital component of financing to community development projects, which address specific needs in low-income communities by creating quality housing, nearby employment opportunities and social/educational services.

### KEY METRICS

**\$75** MILLION

approved in low-income housing tax credit investments in our key markets to support neighborhoods in 2019 (\$81 million completed/closed in 2019)

## VOLUNTEERISM

We encourage our colleagues to share their time and expertise to support our commitment to the communities in which we operate. Our volunteer programs help drive Comerica's success by improving the lives of individuals, groups and communities in which we do business by building and managing relationships and strategic partnerships. Our colleague volunteers 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.

[KEY METRICS](#)

[COMERICA'S NATIONAL  
DAYS OF SERVICE](#)

 OVER **71,300** HOURS

of volunteer time donated to nonprofits by  
Comerica colleagues, worth **over \$1.8 million**

## PHILANTHROPY

When it comes to investing in our communities, our Core Values of Collaboration and Involvement have led us to achieve strong dedication to charitable organizations within our key markets through our financial and volunteer support. We believe this approach not only strengthens our company and the communities we are a part of, but also helps create a strong, positive image for the company.

[KEY METRICS](#)

[DALLAS-AREA TEENS  
RECEIVE GIFT OF TECH](#)

 DONATE OVER **\$8.4** MILLION

donated to charitable organizations via more  
than 1,400 grants/sponsorships

Through our philanthropic efforts our three-fold mission is to (1) target issues that are important to both our communities and the company, (2) address diversity needs, and (3) create pride and loyalty for Comerica colleagues. It is our priority when giving to assist low- and moderate-income individuals and families in a manner that aligns with our overall business approach and supports our strategic direction as a financial services provider. For more information, visit [Comerica Charitable Giving](#) on Comerica.com. In 2019, we also launched the Comerica Cares Fund Relief Program, which includes individual colleague donations supplemented by Comerica to help our colleagues experiencing financial hardships.

# ADDITIONAL INFORMATION

This Additional Information section includes important supporting documentation for the 2019 Comerica Corporate Responsibility Report, including:

- 1) Our Key Metrics Tables, which include metrics we track and which showcase our management of the Impact Topics. Our Key Metrics tables have been broken down by Report Section (dark blue headings) and Impact Topic (light blue headings). You will find footnote references for metrics where we have identified additional details or where changes to previous shared metrics have been identified. Previous 2012-2017 key metrics are available in the [Comerica 2018 Corporate Responsibility Report \(Pages 90-96\)](#).
- 2) Our Reporting Methodology, which explains the reporting standards and guidance used and references other reporting information.
- 3) The Global Reporting Initiative (GRI) Standards Content Index, which highlights how our report connects to and meets the Global Reporting Initiative Standards framework for sustainability reporting; and
- 4) The Sustainability Accounting Standards Board (SASB) Content Index, which references SASB indicators that we have addressed within our CR Report.

OUR COMPANY	2018	2019
Gross revenue (Millions \$)*	3,328	3,349
Market capitalization at year end (Millions \$)**	10,996	10,195
Common and preferred stock dividends (Millions \$)	309	398
Taxes (Millions \$)	285	336
Employee compensation and benefits (Millions \$)	1,009	1,020
Goods and services purchased (Millions \$)	776	709
Total loans at year end (Millions \$)	50,163	50,369

\* Gross revenue is comprised of net interest income and noninterest income.

\*\* Source: S&P Global Market Intelligence.

CUSTOMERS	2018	2019
New small business loan commitments (Millions \$)	>1,000	>1,000
SBA lending, including 7a and 504 loans (Millions \$)	124	128
Privacy & Protection		
Number of substantiated complaints received concerning breaches of customer privacy- complaints received from outside parties and substantiated by the organization	N/A	2
Total number of identified leaks, thefts or losses of customer data	49	55
Innovation & Technology		
Number of applications migrated to the cloud to provide more secure, cost-effective and efficient data storage	150	180
ESG-Related Lending & Investment		
<a href="#">See Environmentally Beneficial Lending Metric</a>		
<a href="#">See Community and Economic Development Loans and Tax Credit Investment Metrics</a>		
<a href="#">See Total in New Account Openings from Market Segmentation Initiative (MSI) Business Referrals Metric</a>		

RESPONSIBLE BUSINESS	2018	2019
<b>Anti-Corruption, Ethics and Countering Bribery</b>		
Number of internal incidents of alleged corrupt behavior investigated	227	241
Number of cases where allegations were substantiated and/or employee admitted involvement	102	103
Number of legal rulings against Comerica or its employees for corruption	0	0
<b>Colleague Annual Compliance Training (percent relevant employees who completed the required course)</b>		
Anti-Money Laundering	100.0	99.6
Comerica Code of Business Conduct and Ethics for Employees	99.9	99.9
Fair Lending Anti-Discrimination	99.9	99.8
Information Privacy and Protection	99.9	99.9
Community Reinvestment Act	99.9	99.8
Financial Abuse of Elderly and Vulnerable Adults	99.9	99.9
Workplace Harassment	99.3	99.8
Information Lifecycle Management	99.9	99.9
Diversity	99.2	99.9
Sustainability	100.0	100.0
<b>Public Policy &amp; Government Relations</b>		
Comerica PAC contributions to political candidates and committees (Thousands \$)*	624	135

\* Comerica PAC contributions (Nov 1 previous year-Oct 31 reporting year)

COLLEAGUES			2018	2019
Talent Attraction- Employee Demographics				
Total Employees	Full-time equivalents (FTE)*		7,865	7,747
	Total number of employees*		8,051	7,948
	Full-time		7,573	7,467
	Part-time		478	481
	% Female	Full-time	65	64
		Part-time	84	85
	% Male	Full-time	35	36
Part-time		16	15	
Employee Breakdown by Generations	% Traditionalist (Born prior to 1946)		1	<0.1
	% Baby Boomer (1946-1964)		30	31
	% Gen X (1965-1980)		39	36
	% Millennial (1981-2000)		31	33
	% Generation Z (After 2000)		0	<0.1
Employee Breakdown by Length of Service	% 0-5 Years		43	45
	% 6-15 Years		24	23
	% 16-25 Years		17	17
	% 26+ Years		16	15
New Hires By Gender	Female	Number of new hires	751	740
		% of Total	60	58
	Male	Number of new hires	512	525
		% of Total	41	42
New Hires By Age	Under 30 Years Old	Number of new hires	574	565
		% of Total	45	45
	30-50 Years Old	Number of new hires	501	535
		% of Total	40	42
	Over 50 Years Old	Number of new hires	188	165
		% of Total	15	13

\*As reported in Comerica's 2019 10-K (page F-109).

COLLEAGUES		2018	2019	
Talent Attraction- Employee Demographics				
New Hires By Market	California	Number of new hires	305	271
		% of Total	24	21
	Florida	Number of new hires	13	17
		% of Total	1	1
	Michigan	Number of new hires	603	659
		% of Total	48	52
	Texas/Arizona	Number of new hires	321	317
		% of Total	26	25
	Other	Number of new hires	13	1
		% of Total	1	<1
Talent Development				
Average hours of training per employee (mandatory and non-mandatory)		24	35	
Percentage of colleagues who took advantage of non-mandatory, non-compliance skills training		77	74	
Number of skills-based courses offered to Comerica colleagues		6,227	9,346	
Leadership Development Program (number of graduates)*		27	—	
Emerging Leaders Program (number of graduates)*		—	44	
Talent Retention				
Services provided through Comerica's Employee Assistance Program (# of instances)		3,621	3,054	
Employees receiving tuition assistance (total number)		131	124	
Value of tuition assistance received (\$)		457,300	444,332	
Employee Awards (number of monetary awards to employees)**		3,382	3,527	
Value of Employee Awards (\$)**		503,571	522,580	

\* Since 2016, Comerica's Leadership Development Program has been offered on a bi-annual basis. The Emerging Leaders Program is also offered on a bi-annual basis.

\*\* 2018 Employee award metrics updated to reflect a more inclusive list of employee recognition awards vs. 2019.

COLLEAGUES		2018	2019	
Talent Retention				
Employee Turnover Total	Number of	1,373	1,334	
Employee Turnover By Gender	Female	Number of	855	859
		% of Total	62.3	64
	Male	Number of	518	475
		% of Total	37.7	36
Employee Turnover By Age	Under 30 Years Old	Number of	385	368
		% of Total	28	28
	30-50 Years Old	Number of	542	581
		% of Total	39.5	44
	Over 50 Years Old	Number of	446	385
		% of Total	32.5	29
Employee Turnover By Type and Market	Voluntary	Number of	976	974
		% of Total	71	73
		California %	23	25
		Florida %	1	1
		Michigan %	48.3	47
		Texas/Arizona %	27.6	27
	Involuntary	Number of	398	360
		% of Total	29	27
		California %	17.3	9
		Florida %	1.3	1
		Michigan %	66.3	60
		Texas/Arizona %	15.1	30

COLLEAGUES	2018	2019
Employee Engagement		
Number of Diversity-Related Employee Resource Network Group (ERNG) categories	8	7
Number of Diversity-Related ERNG chapters within our markets	N/A	13
Number of Local Diversity Awareness Roundtable Teams	5	5
Number of Green Office Teams	10	9
Number of employees participating in Financial Education Brigade	N/A	183
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program (Percent)*	88	84
Bronze-level certified colleagues (number of)	5,122	4,807
Silver-level certified colleagues (number of)	4,221	3,905
Gold-level certified colleagues (number of)	3,396	3,190
Platinum-level certified colleagues (number of)	2,021	1,928
Colleagues enrolled in Comerica's Master of Sustainability Awareness (MSA) Program (Number of)*/**	318	482
Seedling-level certified colleagues (number of)	38	69
Sapling-level certified colleagues (number of)	7	13
Mighty Oak-level certified colleagues (number of)	2	5

\* MDA/MSA level listings are cumulative. If a colleague has been certified at the highest level, employee is also counted in the lower certification levels.

\*\* Comerica's MSA Program was offered to all colleagues starting in 2016.

DIVERSITY & INCLUSION	2018	2019
Diversity & Inclusion- Internal		
Women employees (Percent of total employees)	66	65
Women Officials and Managers (total number)*	697	684
Women Professionals (total number)*	1,532	1,517
Women Other (Administrative Support, Sales Worker, and Service Worker) (total number)*	3,089	2,954
Racial/Ethnic Minority Population employees (Percent of total employees)	40.1	40
Racial/Ethnic Minority Officials and Managers (total number)*	352	356
Racial/Ethnic Minority Professionals (total number)*	901	932
Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number)*	1,976	1,882
For more employee diversity metrics, please refer to the <a href="#">Key Metrics - Talent Attraction</a> .		
Diversity & Inclusion- External		
Reaching Diverse Customers		
Number of Comerica Market Segmentation Initiative (MSI) teams	19	19
Total in new account openings from MSI business referrals (Millions \$)	>300	>160
Supplier Diversity		
Diverse Supplier Discretionary Spend (Millions \$)	64.9	52
Discretionary Spend with Diverse Suppliers Goal (Millions \$) for contracts originating in reporting year	51	47
Tier 2 Supplier Diversity Spend (Million \$)	22	17
Percent of RFPs tracked which included diverse suppliers	50	56
Percent of contracts awarded to diverse suppliers for relevant RFPs**	34	34
Board Diversity		
Number of Board Directors	12	11
% Independent Directors	83	91
% Racial/Ethnic Minority Directors***	25	27
% Female Directors***	25	27

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

\*\* Percentage of projects that included diverse suppliers that were sourced to diverse suppliers

\*\*\* Currently (2020) A racial/ethnic minority Director holds key Board leadership position (Enterprise Risk Committee chair) and female Directors hold key Board leadership positions (Independent Facilitating Director and Governance, Compensation and Nominating Committee chair)

ENVIRONMENT	2012	2018	2019
Energy			
Employee Numbers for Intensity Metrics			
Intensity-based employee FTEs - used for environmental intensity-based metrics*	N/A	7,787	7,600
Total Workers (including employees and contingent workers within our buildings, on FTE basis)- used for environmental intensity-based metrics*	N/A	8,763	8,422
Energy Use (MWh)			
Total direct and indirect energy use- real estate and transport (MWh)	153,210	114,822	105,699
Total direct and indirect energy use- real estate and transport (Billion Joules)	551,556	413,359	380,407
Total direct and indirect energy use- real estate only (MWh)**	148,266	111,469	102,438
Direct energy use- fossil fuels (MWh)	30,966	28,525	27,646
Indirect energy use- purchased electricity, steam, chilled water in metered buildings (MWh)	93,779	60,876	56,960
Indirect energy use- estimated electricity use in leased (and unmetered) buildings (MWh)	28,465	16,518	13,623
Energy Intensity			
Total direct and indirect energy use- real estate** (MWh) per square foot at year end	0.0267	0.0253	0.0253
Total direct and indirect energy use- real estate** (MWh) per square foot - average square feet over four quarters	N/A	0.0245	0.0234
Total direct and indirect energy use (MWh) per full time employee (FTE)	N/A	14.74	13.90

\* Our Human Resources-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 intensity-based FTE number for our real estate-related intensity-based metrics.

\*\* Total direct and indirect energy use- real estate only includes Natural Gas, Diesel Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and Chilled Water. Steam and chilled water through 2015. Estimated Natural Gas and Propane Gas for heat were new in 2015.

ENVIRONMENT	2012	2018	2019
<b>Climate Change and Greenhouse Gas (GHG) Emissions*</b>			
Total GHG Emissions from Scopes 1 & 2 Real Estate and Scope 1 Travel (Metric tons of CO <sub>2</sub> e)	81,735	46,287	42,621
GHG emissions- Scopes 1 and 2 Real Estate only- (Metric tons of CO <sub>2</sub> e)	80,533	45,477	41,828
Emissions intensity- real estate (metric tons of CO <sub>2</sub> e per square foot at year end) within organization	0.0145	0.0103	0.0096
Emissions intensity- real estate (metric tons of CO <sub>2</sub> e per square foot-average square feet over four quarters) within organization	N/A	0.0100	0.0096
Percent Cumulative Scope 1 & 2 Real Estate GHG reduction from 2012 base year (Goal= 20 percent GHG reduction from base year by 2020)	N/A	43.5	48.1
GHG emissions- Scope 1 transport only	1,201	810	793
<b>Breakdown by Scope</b>			
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	6,371	6,304
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings	74,784	39,916	36,316
<b>Scope 3 GHG Emissions (Metric tons of CO<sub>2</sub>e)- Supply Chain and Transport*</b>			
<b>Purchased Goods and Services</b>			
Total lifecycle paper emissions**	3,055	5,257	4,560
Life cycle emissions-office copy paper use**	1,270	1,964	1,662
Life cycle emissions-other office paper use**	1,563	2,930	2,721
Life cycle emissions-marketing paper use**	222	364	176
Total lifecycle computer emissions	520	3,031	2,816
Total lifecycle carpeting emissions	137	289	504

\*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.

\*\* Paper Emissions in 2018-2019 were calculated using Environmental Paper Network Paper Calculator Version 4.0. 2012 Paper Emissions were calculated using Environmental Paper Network Paper Calculator Version 3.2.

ENVIRONMENT	2012	2018	2019
Climate Change and Greenhouse Gas (GHG) Emissions			
Scope 3 GHG Emissions (Metric tons of CO <sub>2</sub> e)- Supply Chain and Transport (Continued)			
<b>Capital Goods</b>			
Total lifecycle furniture emissions	N/A	1,283	989
<b>Fuel-and-energy related activities</b>			
Electricity transmission/distribution loss emissions	N/A	1,868	1,708
<b>Upstream Transportation and Distribution</b>			
Shipping emissions	N/A	133	195
Armored vehicle emissions	N/A	59	69
<b>Waste Generated in Operations</b>			
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	514	505
<b>Business Travel</b>			
Employee business travel by air and car	4,431	3,453	3,515
Emissions intensity- Employee business travel emissions (metric tons of CO <sub>2</sub> e) per full-time employee (FTE)	N/A	0.44	0.46
<b>Employee Commuting</b>			
Employee commuting emissions	N/A	25,544	25,837
<b>Downstream Leased Assets</b>			
<i>Total subleased emissions</i>	1,257	1,027	629
Subleased metered electricity	726	261	397
Subleased estimated electricity	423	560	12
Subleased natural gas	81	25	71
Subleased steam	28	0	0
Subleased estimated heat-natural gas	N/A	6	0
Subleased corporate jet emissions	N/A	175	149
<b>Other Downstream</b>			
CBRE Business Travel on Comerica Account	N/A	181	171

ENVIRONMENT	2012	2018	2019
Real Estate Square Footage (Square feet at year end)			
Total metered and unmetered square feet at year end	5,545,466	4,401,337	4,350,468
Total subleased square feet at year end	137,637	51,522	63,375
Real Estate Square Footage (Average square feet over four quarters)			
Average metered and unmetered square feet over four quarters	N/A	4,547,160	4,370,816
Average subleased square feet over four quarters	N/A	115,654	66,099
Environmental Resource Management			
<b>Waste</b>			
Landfilled employee waste (short tons)	2,086	1,480	1,455
Percent Cumulative reduction from 2012 base year (Goal=20 percent Landfilled Waste Reduction by 2020)	N/A	29.1	30.3
Total recycled/re-purposed waste (short tons)	3,372	2,376	2,184
Recycled office paper	3,108	2,148	1,928
Recycled/repurposed electronic equipment	149	48	87
Recycled operational waste	110	156	154
Recycled cardboard bailer waste	N/A	6	3
Recycled pallets	N/A	12	10
Universal waste	3	5	2
Total waste diverted from landfill (Percent)- including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste	62	62	60
<b>Paper</b>			
Total paper consumption (tons)	1,266	695	602
Office copy paper consumption (tons)	560	289	245
Other office paper consumption (tons)	618	361	336
Marketing paper consumption (tons)	88	45	22
Paper Intensity metrics (pounds consumed per FTE)			
Total office paper (office copy and other office paper) consumption in pounds per FTE	N/A	166.88	152.72
Office copy paper consumption in pounds per FTE	N/A	74.12	64.38
Percent Cumulative reduction from 2012 base year (Goal=50 percent Office Copy Paper Reduction by 2020)	N/A	48.5	56.3

ENVIRONMENT	2012	2018	2019
<i>Environmental Attributes of Paper</i>			
Total FSC-certified office paper (Percent of total)	47	46	43
Total FSC-certified marketing paper (Percent of total)	64	47	100
Office copy paper $\geq$ 30 percent post-consumer recycled content (Percent of total office copy paper)	97	95	96
All other papers (excluding office copy paper) $\geq$ 10 percent post-consumer recycled content (Percent of total papers except office copy paper)	14	13	9
Total post-consumer recycled content by weight (Percent of total paper consumption)	14	13	13
<b>Water Stewardship</b>			
Total water consumption (cubic meters)*	451,532	327,001	301,369
Intensity metric- Water consumption (cubic meters per Total Employee FTE)	N/A	41.99	39.65
Intensity metric- Water consumption (cubic meters per Total Worker FTE)	N/A	37.32	35.78
Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020)	N/A	27.6	33.3
<b>Environmentally-Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)</b>			
Loan commitments (Millions \$)	1,043	772	923
Loan commitments (number of companies)	127	75	82

\* 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.

ENVIRONMENT	2012	2018	2019
Supplier Sustainability Engagement			
Percentage of top spend screened every three years for environmental sustainability	30	34	39
Percent of spend dollars with suppliers screened for sustainability with a score of A through C	N/A	28	55
Percent change in average sustainability score of suppliers (Round 3 scoring vs. Round 2 scoring)*	N/A	(3)	(1)
Percentage of carpet purchases that were NSF 140 Gold rated and Cradle-to-Cradle silver certified**	99	100	100
Percentage of carpet purchases that contained recycled content**	N/A	97	97
Percentage of computers and displays purchased that carried an EPEAT rating	N/A	91	99
Percentage of furniture purchases that were BIFMA level® certified***	N/A	90	83
Percentage of office supplies purchased from Office Depot that contained post-consumer recycled content ****	N/A	21	18
Percentage of office supplies purchased from Office Depot that were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System	57	36	24

\* 2018 percent change included supplier scoring groups 1-3; 2019 included supplier scoring groups 1-4.

\*\* Inclusive of Shaw purchases, representing 93% of all 2019 carpet purchases

\*\*\* EPEAT certified computers/displays for 2019 (48.9% bronze, 49.3% silver and 0.8% gold)

\*\*\*\* Primarily related to our paper product purchases that contain recycled content. As our paper product purchases continue to decline, so does the recycled content percentage.

COMMUNITY	2018	2019
<b>Financial Inclusion &amp; Financial Education</b>		
Number of ATMs	584	577
Number of U.S. banking centers	435	435
Comerica Secured Credit Cards (Number of) for low- and moderate-income customers*	773	770
Number of Access Checking Customers (low- and moderate-income)*/**	10,449	8,819
Access Checking Balances (Millions \$) (low- and moderate-income customers) */**	27	28
Number of low- and moderate-income individuals reached through Comerica-sponsored financial education events with nonprofit partners	42,500	35,766
<b>Community Investment &amp; Development</b>		
Community and economic development loans (Millions \$)	398	327
Low-income housing tax credit investment deals closed (Millions \$)	71	81
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent)	7	4
Number of micro-enterprise loan funds supported	28	28
<b>Volunteerism &amp; Philanthropy</b>		
Charitable gifts and corporate contributions (Millions \$)	7.8	8.4
Employee United Way contributions (Millions \$)	1.7	1.7
Employee time volunteered (hours)	51,697	71,376
Corporate-wide employee volunteer goal (hours)***	64,000	64,000
Number of employee volunteers	1,850	2,490
Approximate worth of employee volunteer time (Millions \$)	1.3	1.8

\* Tailored retail banking products within our CRA Assessment areas in Arizona, California, Florida, Michigan and Texas

\*\*Access Checking account has no monthly fee with direct deposit.

\*\*\* Annual corporate-wide employee volunteer goal is equivalent to approximately eight hours per employee

Comerica's 2019 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 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 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 seventh GRI-based Corporate Responsibility (formerly Sustainability) Report. It covers our sustainability performance from January 1, 2019, to December 31, 2019 (fiscal year 2019). In some instances, 2018 or previous data is included for comparison and in some limited instances, the report also references some projects and initiatives that stretched beyond 2019 and into 2020.

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2019 Comerica Incorporated Annual Report](#) (herein referred to as 2019 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2019. 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 in our [2018 Comerica Corporate Responsibility 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. Our SASB Content Index (link) is provided at the end of the Additional Information section.

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

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	Core vs Comprehensive	Link or Direct Comments	Omission
GRI 101: Foundation- see <a href="#">ESG Impact Assessment</a>			
General Disclosures			
GRI 102: Organizational Profile			
102-1 Name of the organization	Core	Comerica Inc.	—
102-2 Activities, brands, products, and services	Core	<a href="#">Our Company, 2019 Annual Report</a>	—
102-3 Location of headquarters	Core	Comerica Corporate Headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201	—
102-4 Location of operations	Core	<a href="#">Our Company</a>	—
102-5 Ownership and legal form	Core	<a href="#">Our Company, 2019 Annual Report</a>	—
102-6 Markets served	Core	<a href="#">Our Company</a>	—
102-7 Scale of the organization	Core	<a href="#">Our Company, 2019 Annual Report, Key Metrics Table</a>	—
102-8 Information on employees and other workers	Core	<a href="#">Our Company, Colleagues, Diversity and Inclusion, Key Metrics Table</a> The majority of work is performed by Comerica payrolled employees. Non-employee contingent workers represent 13.2% 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.	Total number of supervised (contingent) workers by gender is omitted. We do not collect data by gender for our contingent workforce.
102-9 Supply chain	Core	<a href="#">Supply Chain- 2018 CSR Report (Page 10), Supplier Diversity Program, Key Metrics Table</a>	—
102-10 Significant changes to the organization and its supply chain	Core	<a href="#">2019 Annual Report</a>	—
102-11 Precautionary Principle or approach	Core	<a href="#">Business Risk Management</a>	—
102-12 External initiatives	Core	Comerica does not currently subscribe to or endorse externally developed charters or principles.	—

GRI Standard Disclosure	Core vs Comprehensive	Link or Direct Comments	Omission
<b>General Disclosures</b>			
<b>GRI 102: Organizational Profile</b>			
102-13 Membership of associations	Core	<a href="#">Political Activities and Contributions, Supplier Diversity Program</a>	—
<b>Strategy</b>			
102-14 Statement from senior decision-maker	Core	<a href="#">Message from Leaders on Corporate Responsibility</a>	—
102-15 Key impacts, risks, and opportunities	Comprehensive	<a href="#">ESG Impact Assessment, Business Risk Management, Most Recent CDP Response, 2019 Annual Report</a>	—
<b>Ethics and integrity</b>			
102-16 Values, principles, standards, and norms of behavior	Core	<a href="#">Our Company, 2018 CSR Report (Pages 10-11), Corporate Governance, 2020 Proxy Statement, Reputation, Diversity and Inclusion, Diversity Commitment</a>	—
102-17 Mechanisms for advice and concerns about ethics	Comprehensive	<a href="#">2018 CSR Report (Pages 10-11), Corporate Governance, Responsible Business, Business Risk Management, Anti-Corruption, Ethics &amp; Countering Bribery, Colleagues, Corporate Governance Guidelines, Code of Business Conduct and Ethics for Employees</a>	—
<b>Governance</b>			
102-18 Governance structure	Core	<a href="#">Responsible Business, Corporate Governance, Corporate Governance Guidelines, 2020 Proxy Statement</a>	—
102-19 Delegating authority	Comprehensive	<a href="#">2018 CSR Report (Pages 36-37), Responsible Business, Colleagues, Corporate Governance Guidelines</a>	Disclosure partially met
102-20 Executive-level responsibility for economic, environmental, and social topics	Comprehensive	<a href="#">2020 Proxy Statement, 2018 CSR Report, Corporate Governance, Corporate Governance Guidelines, Most Recent CDP Response</a>	—
102-21 Consulting stakeholders on economic, environmental, and social topics	Comprehensive	<a href="#">ESG Impact Assessment</a>	—
102-22 Composition of the highest governance body and its committees	Comprehensive	<a href="#">Responsible Business, 2020 Proxy Statement, Corporate Governance, Corporate Governance Guidelines</a>	—
102-23 Chair of the highest governance body	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-24 Nominating and selecting the highest governance body	Comprehensive	<a href="#">Diversity and Inclusion, Board Diversity, 2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-25 Conflicts of interest	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-26 Role of highest governance body in setting purpose, values, and strategy	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-27 Collective knowledge of highest governance body	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—

GRI Standard Disclosure	Core vs Comprehensive	Link or Direct Comments	Omission
<b>General Disclosures</b>			
<b>GRI 102: Organizational Profile</b>			
102-13 Membership of associations	Core	<a href="#">Political Activities and Contributions, Supplier Diversity Program</a>	—
<b>Strategy</b>			
102-14 Statement from senior decision-maker	Core	<a href="#">Message from Leaders on Corporate Responsibility</a>	—
102-15 Key impacts, risks, and opportunities	Comprehensive	<a href="#">ESG Impact Assessment, Business Risk Management, Most Recent CDP Response, 2019 Annual Report</a>	—
<b>Ethics and integrity</b>			
102-16 Values, principles, standards, and norms of behavior	Core	<a href="#">Our Company, 2018 CSR Report (Pages 10-11), Corporate Governance, 2020 Proxy Statement, Reputation, Diversity and Inclusion, Diversity Commitment</a>	—
102-17 Mechanisms for advice and concerns about ethics	Comprehensive	<a href="#">2018 CSR Report (Pages 10-11), Corporate Governance, Responsible Business, Business Risk Management, Anti-Corruption, Ethics &amp; Countering Bribery, Colleagues, Corporate Governance Guidelines, Code of Business Conduct and Ethics for Employees</a>	—
<b>Governance</b>			
102-18 Governance structure	Core	<a href="#">Responsible Business, Corporate Governance, Corporate Governance Guidelines, 2020 Proxy Statement</a>	—
102-19 Delegating authority	Comprehensive	<a href="#">2018 CSR Report (Pages 36-37), Responsible Business, Colleagues, Corporate Governance Guidelines</a>	Disclosure partially met
102-20 Executive-level responsibility for economic, environmental, and social topics	Comprehensive	<a href="#">2020 Proxy Statement, 2018 CSR Report, Corporate Governance, Corporate Governance Guidelines, Most Recent CDP Response</a>	—
102-21 Consulting stakeholders on economic, environmental, and social topics	Comprehensive	<a href="#">ESG Impact Assessment</a>	—
102-22 Composition of the highest governance body and its committees	Comprehensive	<a href="#">Responsible Business, 2020 Proxy Statement, Corporate Governance, Corporate Governance Guidelines</a>	—
102-23 Chair of the highest governance body	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-24 Nominating and selecting the highest governance body	Comprehensive	<a href="#">Diversity and Inclusion, Board Diversity, 2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-25 Conflicts of interest	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-26 Role of highest governance body in setting purpose, values, and strategy	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-27 Collective knowledge of highest governance body	Comprehensive	<a href="#">2020 Proxy Statement, Corporate Governance Guidelines</a>	—

GRI Standard Disclosure	Core vs Comprehensive	Link or Direct Comments	Omission
<b>General Disclosures</b>			
<b>Governance</b>			
102-28 Evaluating the highest governance body's performance	Comprehensive	<a href="#">Responsible Business, Corporate Governance, 2020 Proxy Statement</a>	—
102-29 Identifying and managing economic, environmental, and social impacts	Comprehensive	<a href="#">ESG Impact Assessment, Responsible Business, Business Risk Management, 2018 CSR Report (Pages 12-15), Most Recent CDP Response</a>	—
102-30 Effectiveness of risk management processes	Comprehensive	<a href="#">Responsible Business, Business Risk Management</a>	—
102-31 Review of economic, environmental, and social topics	Comprehensive	<a href="#">ESG Impact Assessment, Reporting Methodology, Corporate Governance</a>	—
102-32 Highest governance body's role in sustainability reporting	Comprehensive	Our CFO reviews and approves Comerica's Corporate Responsibility Report	—
102-33 Communicating critical concerns	Comprehensive	<a href="#">Business Risk Management, Code of Business Conduct, 2018 CSR Report (Page 51)</a>	—
102-34 Nature and total number of critical concerns	Comprehensive	—	—
102-35 Remuneration policies	Comprehensive	<a href="#">Corporate Governance, 2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-36 Process for determining remuneration	Comprehensive	<a href="#">Corporate Governance, 2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-37 Stakeholders involvement in remuneration	Comprehensive	<a href="#">Corporate Governance, 2020 Proxy Statement, Corporate Governance Guidelines</a>	—
102-38 Annual total compensation ratio	Comprehensive	—	—
102-39 Percentage increase in annual total compensation ratio	Comprehensive	—	—
<b>Stakeholder engagement</b>			
102-40 List of stakeholder groups	Core	<a href="#">ESG Impact Assessment</a>	—
102-41 Collective bargaining agreements	Core	0 percent of employees are covered by collective bargaining agreements	—
102-42 Identifying and selecting stakeholders	Core	<a href="#">ESG Impact Assessment</a>	—
102-43 Approach to stakeholder engagement	Core	<a href="#">ESG Impact Assessment</a>	—
102-44 Key topics and concerns raised	Core	<a href="#">ESG Impact Assessment</a>	—

GRI Standard Disclosure	Core vs Comprehensive	Link or Direct Comments	Omission
General Disclosures			
Reporting practice			
102-45 Entities included in the consolidated financial statements	Core	<a href="#">2019 Annual Report</a>	—
102-46 Defining report content and topic Boundaries	Core	<a href="#">ESG Impact Assessment</a>	—
102-47 List of material topics	Core	<a href="#">ESG Impact Assessment</a>	—
102-48 Restatements of information	Core	There were no material restatements of information provided in this report.	—
102-49 Changes in reporting	Core	<a href="#">Reporting Methodology</a>	—
102-50 Reporting period	Core	<a href="#">Reporting Methodology</a>	—
102-51 Date of most recent report	Core	<a href="#">Reporting Methodology</a>	—
102-52 Reporting cycle	Core	<a href="#">Reporting Methodology</a>	—
102-53 Contact point for questions regarding the report	Core	<a href="#">Reporting Methodology</a>	—
102-54 Claims of reporting in accordance with the GRI Standards	Core	<a href="#">Reporting Methodology</a>	—
102-55 GRI content index	Core	This GRI Content Index	—
102-56 External assurance	Core	<a href="#">Most Recent CDP Response</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

Table of Contents

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
Topic-Specific Disclosures				
General Disclosures				
GRI 200 Economic Standard Series				
Economic Performance		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	<a href="#">ESG Impact Assessment, 2019 Annual Report</a>	—
	103-2 The management approach and its components	No	<a href="#">2019 Annual Report</a>	—
	103-3 Evaluation of the management approach	No	<a href="#">2019 Annual Report</a>	—
GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	No	<a href="#">2019 Annual Report, Key Metrics Table</a>	—
	201-2 Financial implications and other risks and opportunities due to climate change	No	<a href="#">Environmental Policy Statement, Climate Change Impacts and Energy &amp; Emissions, Environmentally Beneficial Lending, 2018 CSR Report (Pages 67,78-79), Most Recent CDP Response</a>	—
Market Presence		No		
Indirect Economic Impacts		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	<a href="#">ESG Impact Assessment, 2018 CSR Report (Page 13)</a>	—
	103-2 The management approach and its components	No	<a href="#">Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Comerica Works, Community Reinvestment Act (CRA)</a>	—
	103-3 Evaluation of the management approach	No	<a href="#">Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, 2018 CSR Report (Pages 30-34, 83-89)</a>	—
GRI 203: Indirect Economic Impacts	203-1 Infrastructure investments and services supported	No	<a href="#">Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, 2018 CSR Report (Pages 83-89), Comerica Charitable Giving, Comerica Works,CRA</a>	—
	203-2 Significant indirect economic impacts	No	<a href="#">Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Comerica Works,CRA, Key Metrics-Community</a>	—
Procurement Practices		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	<a href="#">ESG Impact Assessment, Supplier Diversity Program, 2018 CSR Report (Pages 10, 64-65, 80-81)</a>	—
	103-2 The management approach and its components	No	<a href="#">Supplier Diversity Program, Key Metrics Table, 2018 CSR Report (Pages 10, 80-81)</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

Table of Contents

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
<b>Topic-Specific Disclosures</b>				
<b>General Disclosures</b>				
<b>GRI 200 Economic Standard Series</b>				
GRI 103: Management Approach	103-3 Evaluation of the management approach	No	<a href="#">Supply Chain (2018 CSR Report, Page 10)</a> , <a href="#">Reducing Environmental Impacts in our Supply Chain (2018 CSR Report, Page 80)</a>	—
GRI 204: Procurement Practices	204-1 Proportion of spending on local suppliers	No	<a href="#">Supply Chain (2018 CSR Report, Page 10)</a> , <a href="#">Key Metrics Table</a>	—
<b>Anti-corruption</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Corporate Governance, Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Corporate Governance, Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
GRI 205: Anti-corruption	205-1 Operations assessed for risks related to corruption	Yes	<a href="#">Corporate Governance, Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	205-2 Communication and training about anti-corruption policies and procedures	Yes	<a href="#">Corporate Governance, Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	205-3 Confirmed incidents of corruption and actions taken	Yes	<a href="#">Anti-Corruption, Ethics &amp; Countering Bribery, Key Metrics</a>	—
<b>Anti-competitive Behavior</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Responsible Business</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Anti-Corruption, Ethics &amp; Countering Bribery, Responsible Business</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Anti-Corruption, Ethics &amp; Countering Bribery, Responsible Business</a>	—
GRI 206: Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Yes	<a href="#">Anti-Corruption, Ethics &amp; Countering Bribery, Responsible Business</a>	—
<b>GRI 300 Environmental Standards Series</b>				
<b>Materials</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Environmental Policy Statement, Environmental Resource Management, 2018 CSR Report, Page 72-73</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Environmental Resource Management, Environmental Policy Statement, 2018 CSR Report, Pages 72-73</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Environmental Resource Management, 2018 CSR Report (Pages 72-73)</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

[Table of Contents](#)

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
<b>Materials</b>		Yes		
GRI 301: Materials	301-1 Materials used by weight or volume	Yes	<a href="#">Key Metrics Table</a>	—
	301-2 Recycled input materials used	Yes	<a href="#">Key Metrics Table, 2018 CSR Report (Page 72)</a>	—
	301-3 Reclaimed products and their packaging materials	Yes	<a href="#">Key Metrics Table, 2018 CSR Report (Page 72)</a>	—
<b>Energy</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Energy &amp; Emissions</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Energy &amp; Emissions, Environmental Policy Statement, 2018 CSR Report (Page 68-70)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Energy &amp; Emissions, 2018 CSR Report (Page 68-70)</a>	—
GRI 302: Energy	302-1 Energy consumption within the organization	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	302-2 Energy consumption outside of the organization	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	302-3 Energy intensity	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	302-4 Reduction of energy consumption	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response, 2018 CSR Report (Pages 68-70)</a>	—
	302-5 Reductions in energy requirements of products and services	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response, 2018 CSR Report (Pages 68-70)</a>	—
<b>Water</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Environmental Resource Management, 2018 CSR Report (Pages 74-75)</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Environmental Resource Management, 2018 CSR Report (Pages 74-75)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Environmental Resource Management, 2018 CSR Report (Pages 74-75), Key Metrics Table</a>	—
GRI 303: Water and Effluents 2018	303-1 Water withdrawal by source	Yes	<a href="#">Key Metrics Table</a>	Although we have a couple wells and ponds in Michigan for irrigation purposes, the only water metric that we are able to measure is the water which is sourced through local utilities and is tracked through the utility water meter.

# GRI Standards Content Index- Topic-Specific Disclosures

[Table of Contents](#)

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
Biodiversity		No		
Emissions		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Energy &amp; Emissions</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Energy &amp; Emissions, Environmental Policy Statement, 2018 CSR Report (Pages 70-72)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Energy &amp; Emissions, 2018 CSR Report (Pages 70-72)</a>	—
GRI 305: Emissions	305-1 Direct (Scope 1) GHG emissions	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	305-2 Energy indirect (Scope 2) GHG emissions	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	305-3 Other indirect (Scope 3) GHG emissions	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	305-4 GHG emissions intensity	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
	305-5 Reduction of GHG emissions	Yes	<a href="#">Energy &amp; Emissions, Key Metrics Table, Most Recent CDP Response</a>	—
Effluents and Waste		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Environmental Resource Management</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Environmental Resource Management, Environmental Policy Statement</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Environmental Resource Management, Environmental Policy Statement</a>	—
GRI 306: Effluents and Waste	306-2 Waste by type and disposal method	Yes	<a href="#">Environmental Resource Management, Environmental Policy Statement, Key Metrics Table</a>	—
Environmental Compliance		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Environmental Risk Management (2018 CSR Report, Page 78); part of Business Risk Management</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Environmental Risk Management (2018 CSR Report, Page 78)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Environmental Risk Management (2018 CSR Report, Page 78)</a>	—
GRI 307: Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	Yes	There were no significant fines or monetary sanctions associated with non-compliance of environmental laws and regulations in 2019 that would have a material adverse effect on our operations or ability to perform the services we offer.	—
Supplier Environmental Assessment		No		
GRI 308: Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	No	<a href="#">Key Metrics Table</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

[Table of Contents](#)

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
<b>GRI 400 Social Standards Series</b>				
<b>Employment</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment</a> , <a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Employee Engagement</a> , <a href="#">Diversity &amp; Inclusion Report</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Employee Engagement</a> , <a href="#">Diversity &amp; Inclusion Report</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Employee Engagement</a> , <a href="#">Diversity &amp; Inclusion Report</a>	—
GRI 401: Employment	401-1 New employee hires and employee turnover	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Employee Engagement</a> , <a href="#">Key Metrics- New Hires</a> , <a href="#">Key Metrics-Turnover</a>	—
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">2018 CSR Report (Page 50)</a> , <a href="#">Key Metrics Table</a>	—
<b>Labor/Management Relations</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment</a> , <a href="#">Colleagues</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Colleagues</a> , <a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">2018 CSR Report (Pages 45-51)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Colleagues</a> , <a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Employee Engagement</a> , <a href="#">2018 CSR Report (Pages 45-51)</a> , <a href="#">Key Metrics Table</a>	—
GRI 402: Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	Yes	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>Occupational Health and Safety</b>		No		
<b>Training and Education</b>		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment</a> , <a href="#">Talent Attraction, Development &amp; Retention</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Diversity Progress Report</a> , <a href="#">2018 CSR Report (Pages 46-51)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Diversity Progress Report</a> , <a href="#">2018 CSR Report (Pages 46-51)</a>	—
GRI 404: Training and Education	404-1 Average hours of training per year per employee	Yes	<a href="#">Key Metrics Table</a>	—
	404-2 Programs for upgrading employee skills and transition assistance programs	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Key Metrics Table</a>	—
	404-3 Percentage of employees receiving regular performance and career development reviews	Yes	<a href="#">Talent Attraction, Development &amp; Retention</a> , <a href="#">Key Metrics Table</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

[Table of Contents](#)

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
Diversity and Equal Opportunity		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Diversity &amp; Inclusion, Board Diversity, Diversity &amp; Inclusion Report</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Corporate Governance, Diversity &amp; Inclusion, Board Diversity, Diversity &amp; Inclusion Report</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Corporate Governance, Diversity &amp; Inclusion, Board Diversity, Diversity &amp; Inclusion Report</a>	—
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Yes	<a href="#">Corporate Governance, Diversity &amp; Inclusion, Board Diversity, Diversity &amp; Inclusion Report, Key Metrics Table</a>	—
	405-2 Ratio of basic salary and remuneration of women to men	Yes	<a href="#">Diversity Progress Report, 2018 CSR Report (Page 54)</a>	Requested metric not provided in report. Aggregated data on remuneration without detailed accompanying context makes broad comparisons difficult.
Non-discrimination		No		
Freedom of Association and Collective Bargaining		No		
Child Labor		No		
Forced or Compulsory Labor		No		
Security Practices		No		
Rights of Indigenous Peoples		No		
Human Rights Assessment		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	<a href="#">2018 CSR Report (Pages 10, 43), Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	103-2 The management approach and its components	No	<a href="#">2018 CSR Report (Pages 10, 43), Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
	103-3 Evaluation of the management approach	No	<a href="#">2018 CSR Report (Pages 10, 43), Anti-Corruption, Ethics &amp; Countering Bribery</a>	—
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	No	<a href="#">2018 CSR Report (Page 10)</a>	—
	412-2 Employee training on human rights policies or procedures	No	<a href="#">Anti-Corruption, Ethics &amp; Countering Bribery, Key Metrics</a>	—
	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	No	<a href="#">2018 CSR Report (Page 43)</a>	—

# GRI Standards Content Index- Topic-Specific Disclosures

Table of Contents

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
Local Communities		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Community, Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, Community Reinvestment Act (CRA), Business Risk Management</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Community, Financial Inclusion &amp; Financial Education, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, CRA, Business Risk Management</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Community Update Report, Community, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Diversity Commitment, Comerica Charitable Giving, CRA, Business Risk Management</a>	—
GRI 413: Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	Yes	<a href="#">Community Update Report, Business Risk Management, Community, Community Investment &amp; Development, Volunteerism &amp; Philanthropy, Comerica Charitable Giving, CRA, Diversity Commitment</a>	—
Supplier Social Assessment		No		
Public Policy		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Public Policy &amp; Government Relations, Political Activities and Contributions</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>	—
GRI 415: Public Policy	415-1 Political contributions	Yes	<a href="#">Public Policy &amp; Government Relations, Political Activities and Contributions</a>	—
Customer Health & Safety		No		
Marketing and Labeling		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Business Risk Management, Transparency, 2018 CSR Report (Page 41)</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Business Risk Management, Transparency, 2018 CSR Report (Page 41)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Business Risk Management, Transparency, 2018 CSR Report (Page 41)</a>	—
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Yes	<a href="#">2018 CSR Report (Page 41); Key Metrics</a>	—

GRI Standard	Disclosure	Is this topic material?	Link or Direct Comments	Omission
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling	Yes	There were no significant fines in 2019 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.	—
	417-3 Incidents of non-compliance concerning marketing communications	Yes	<a href="#">2018 CSR Report (Page 41)</a>	—
Customer Privacy		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment, Customers, Privacy &amp; Information Protection, Security Commitment</a>	—
	103-2 The management approach and its components	Yes	<a href="#">Privacy &amp; Information Protection, Security Commitment</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">Privacy &amp; Information Protection, Security Commitment</a>	—
GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Yes	<a href="#">Key Metrics Table</a>	—
Socioeconomic Compliance		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	<a href="#">ESG Impact Assessment</a>	—
	103-2 The management approach and its components	Yes	<a href="#">2018 CSR Report (Pages 12-13)</a>	—
	103-3 Evaluation of the management approach	Yes	<a href="#">2018 CSR Report (Pages 12-13)</a>	—
GRI 419: Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	Yes	No significant fines or non-monetary sanctions for non-compliance with laws or regulations in 2019 that would have a material adverse effect on our operations or ability to perform the services we offer.	—

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. Comerica intends to update this index in the summer of 2020 to provide additional disclosures on other applicable SASB Financial Sector standards.

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 FN-CF-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 Table</a>	Metrics (2) and (3) not provided.
	FN-CB-230a.2	Description of approach to identifying and addressing data security risks	Yes	<a href="#">Privacy &amp; Information Protection, 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 Table- Customers; Key Metrics Table- 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="#">2019 Annual Report (p. F-23)</a>	Metrics provided not explicitly separated by small business and community development
	FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Partially	<a href="#">Key Metrics Table</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 Table; Financial Inclusion &amp; Financial Education; 2018 CSR Report (p. 30-32)</a>	—

SASB Financials Sector Commercial Banking Standard Disclosures					
SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
Incorporation of ESG Factors in Credit Analysis	FN-CB-410a.1	Commercial and industrial credit exposure, by industry	Partially	<a href="#">2019 Annual Report</a> (p. F-25 to F-28)	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="#">ESG Lending &amp; Investment, Environmentally Beneficial Lending; Environmental Risk Management</a> (2018 CSR Report, p. 78-79)	—
Business Ethics	FN-CB-510a.1 FN-AC-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="#">2019 Annual Report</a> , p. F-92	All legal proceeding expenses declared in Note 21
	FN-CB-510a.2 FN-AC-510a.2	Description of whistleblower policies and procedures	Yes	<a href="#">Code of Business Conduct and Ethics</a>	—
Systemic Risk Management	FN-CB-550a.2 FN-AC-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	Yes	<a href="#">Business Risk Management; 2019 Annual Report</a> , (p. 2, F-27, F-32)	—
Activity Metrics	FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Partially	<a href="#">2019 Annual Report</a> (p. F-7), <a href="#">Key Metrics Table, Financial Inclusion &amp; Financial Education</a>	(1) and (b) not met
	FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Yes	<a href="#">2019 Annual Report</a> (p. F-15), <a href="#">Customers, Key Metrics Table- Customers, Key Metrics Table- Community</a>	—