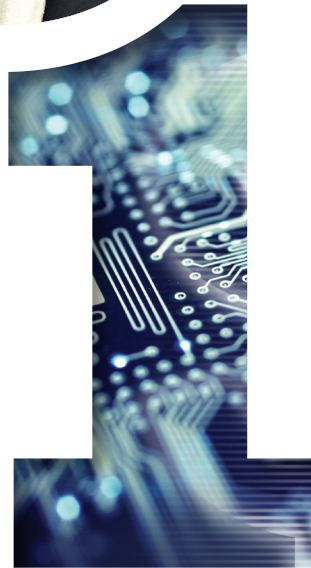




Corporate Responsibility:

A comprehensive review of
our environmental, social
and governance practices &
progress for 2018



RAISE YOUR EXPECTATIONS®

Any statements in this document that are not historical facts are forward-looking statements as defined in the Private Securities Litigation Reform Act of 1995. Words such as “anticipates,” “believes,” “contemplates,” “feels,” “expects,” “estimates,” “seeks,” “strives,” “plans,” “intends,” “outlook,” “forecast,” “position,” “target,” “mission,” “assume,” “achievable,” “potential,” “strategy,” “goal,” “aspiration,” “opportunity,” “initiative,” “outcome,” “continue,” “remain,” “maintain,” “on track,” “trend,” “objective,” “looks forward,” “projects,” “models” and variations of such words and similar expressions, or future or conditional verbs such as “will,” “would,” “should,” “could,” “might,” “can,” “may” or similar expressions, as they relate to Comerica or its management, are intended to identify forward-looking statements. These forward-looking statements are predicated on the beliefs and assumptions of Comerica’s management based on information known to Comerica’s management as of the date of this document and do not purport to speak as of any other date. Forward-looking statements may include descriptions of plans and objectives of Comerica’s management for future or past operations, products or services, and forecasts of Comerica’s revenue, earnings or other measures of economic performance, including statements of profitability, business segments and subsidiaries as well as estimates of credit trends and global stability. Such statements reflect the view of Comerica’s management as of this date with respect to future events and are subject to risks and uncertainties. Should one or more of these risks materialize or should underlying beliefs or assumptions prove incorrect, Comerica’s actual results could differ materially from those discussed. Factors that could cause or contribute to such differences are changes in general economic, political or industry conditions; changes in monetary and fiscal policies; operational, systems or infrastructure failures; reliance on other companies to provide certain key components of business infrastructure; cybersecurity risks; whether Comerica may achieve opportunities for revenue enhancements and efficiency improvements under the GEAR Up initiative, or changes in the scope or assumptions underlying the GEAR Up initiative; Comerica’s ability to maintain adequate sources of funding and liquidity; the effects of more stringent capital requirements; declines or other changes in the businesses or industries of Comerica’s customers; unfavorable developments concerning credit quality; changes in regulation or oversight; heightened legislative and regulatory focus on cybersecurity and data privacy; fluctuations in interest rates and their impact on deposit pricing; transitions away from LIBOR towards new interest rate benchmarks; reductions in Comerica’s credit rating; damage to Comerica’s reputation; Comerica’s ability to utilize technology to efficiently and effectively develop, market and deliver new products and services; competitive product and pricing pressures among financial institutions within Comerica’s markets; the interdependence of financial service companies; the implementation of Comerica’s strategies and business initiatives; changes in customer behavior; management’s ability to maintain and expand customer relationships; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events including, but not limited to, hurricanes, tornadoes, earthquakes, fires, droughts and floods; the impacts of future legislative, administrative or judicial changes to tax regulations; any future strategic acquisitions or divestitures; management’s ability to retain key officers and employees; the impact of legal and regulatory proceedings or determinations; losses due to fraud; the effects of terrorist activities and other hostilities; changes in accounting standards; the critical nature of Comerica’s accounting policies; controls and procedures failures; 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, 2018. 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.

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Corporate Responsibility at Comerica

 **\$772** MILLION in green loans and commitments

 **25%**

of Comerica's Board of Directors are women and **25%** are racial/ethnic minorities

 **196,000** meals provided in connection with our community Shred Day events, which gathered over 650,000 pounds of paper

 **SET GOAL** to reduce GHG emissions **100%** by 2050


 **28** microenterprise loan funds supported

TOP 100 ranking from *Barron's*, JUST Capital and Corporate Knights on sustainability

\$65 MILLION in annual spend with diverse suppliers

 **DONATE OVER \$7.8** MILLION donated to charitable organizations via more than 1,500 grants/sponsorships

 **OVER 50,000** HOURS of volunteer time donated to nonprofits by Comerica colleagues, worth **over \$1.2 million**


 **OVER 150** applications migrated to the cloud to provide more secure, cost-effective and efficient data storage

 **OVER 42,500** low- and moderate-income individuals reached by financial education training events at over 800 Comerica-sponsored events

 **99%** of office copy paper is FSC-certified, with **95%** of office copy paper containing **30%** post-consumer recycled content

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

 **66%** of Comerica's workforce are women

 **54%** **INCREASE** in the number of colleagues who are military veterans in the last five years

Data provided is for 2018, and all comparisons are to 2017 unless otherwise noted.

Progress on 2020 Environmental Goals vs. 2012 Baseline: 50% of Goals Achieved

43.5%
REDUCTION
IN GHGs

**GOAL
ACHIEVED
IN 2016**

as of 2018 vs.
2020 goal of 20%

27.6%
REDUCTION
IN WATER
CONSUMPTION

as of 2018 vs.
2020 goal of 30%

29.1%
REDUCTION
IN WASTE TO
LANDFILL

**GOAL
ACHIEVED
IN 2015**

as of 2018 vs.
2020 goal of 20%

48.5%
REDUCTION
IN OFFICE COPY
PAPER USAGE

as of 2018 vs.
2020 goal of 50%

Visit www.comerica.com/sustainability to view Comerica's 2018 Corporate Responsibility Progress Report, including the sources of data listed above and more information on our corporate responsibility efforts.

CB-200132-01 07/19

 Comerica Bank

Message from our CEO



*Curtis C. Farmer
President and CEO
Comerica Incorporated and
Comerica Bank*

Being a responsible company is a fundamental part of Comerica's culture. Our 170-year history is grounded in a relationship-based approach to helping people and businesses be successful. Living out our Core Values and our commitment to corporate responsibility means we remain firmly rooted in serving as a valued and trusted advisor to our clients while delivering attractive returns for our shareholders and supporting the communities which we serve.

We continue to support our strong culture of diversity and inclusion, community involvement, and environmental commitment, as detailed throughout this report. In addition, in 2018, we remained committed to expanding our product offerings and investing in technology, including the advancement of our TechVision 2020 to securely deliver customer-centric products and services with speed and agility. Combined, these efforts bolstered our financial performance in 2018, with all-time-high revenues and earnings per share, improved efficiency ratio, strong credit quality and exceptional shareholder value.

Our efforts in the area of corporate responsibility have been noticed by many prestigious organizations and we are very proud of the recognition we have received in 2018. Examples are shown on the following page and include listings for best companies for diversity, most civic-minded companies, and most sustainable companies to name just a few.

Our Corporate Responsibility Report provides numerous performance metrics. But these metrics only tell a small part of our story. While providing a comprehensive look at our environmental, social and governance (ESG) practices in accordance with the Global Reporting Initiative (GRI) Standards, we have included examples that illustrate the depth and breadth of our corporate responsibility commitment.

In addition, we continue to map how our corporate responsibility efforts reflect the United Nations' 17 Sustainable Development Goals (SDGs). From addressing inequalities to supporting sustainable cities and communities, we play our part in tending to our planet's and society's greatest needs. For more on our reporting methodology, terminology and standards, please see the [Reporting Methodology](#) section of this report.

As we reflect on 2018, we are pleased with the work we have done and the progress we have made, and we acknowledge our challenges and opportunities. Our thanks to all of you who have helped us along the way. We eagerly anticipate progress towards a thriving future.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Farmer', followed by a long horizontal flourish.

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

Key 2018 Awards and Recognition for Corporate Responsibility

| | |
|--|--|
| One of the most JUST companies in 2018 by Forbes and JUST Capital | 2018 Financial Capabilities Innovation Award from EVERFI in recognition of Comerica's exceptional efforts to improve the financial capabilities of people within our communities |
| Fourth consecutive perfect 100 rating on the Human Rights Campaign Foundation's 2017 Corporate Equality Index | One of <i>Barron's</i> 100 Most Sustainable Companies in the U.S. |
| <i>LATINA Style</i> "50 Best Companies for Latinas to Work For" in the United States | Silver-level veteran friendly employer by the Michigan Veterans Affairs Agency |
| <i>Black Enterprise</i> "50 Best Companies for Diversity" | Sixth consecutive listing on <i>LATINO Magazine's</i> 2018 "LATINO 100" annual list of the top 100 companies providing the most opportunities for Latinos |
| Points of Light "The Civic 50", a list of the top 50 most community-minded companies in the United States | <i>Black EOE Journal's</i> 2018 Best of the Best Early Results list among financial and banking companies |
| <i>Diversity Inc.</i> "Top 10 Regional Companies for Diversity" | <i>Women's Enterprise USA's</i> annual list of top companies for the development of women-owned business enterprises |
| Texas Diversity Council's Top 25 Companies for Diversity & Inclusion | <i>Minority Business News USA's</i> 2018 "Best of the Decade" list for excelling in our unwavering commitment to minority business development and inclusion. |
| Best In Class designation for Supplier Diversity by the Great Lakes Women's Business Council | <i>Corp! Magazine's</i> "Salute to Diversity" award in Michigan |
| 2018 Community Advocate Award from <i>This Woman's Work</i> for our commitment to the community | Best of the Decade for Supplier Diversity by <i>Minority Business News USA</i> |
| 10th consecutive year on FTSE4Good Index and continued listing on Thomson Reuters Corporate Responsibility Indices | 2018 Climate Leadership Award from C2ES and The Climate Registry for excellence in greenhouse gas management |
| Fourth listing on <i>Supply & Demand Chain Executive</i> magazine's Green Supply Chain Award | Ann Arbor SPARK Business Development Award for our sustained commitment to the Michigan area and its start-up companies |

Message from our Director of Corporate Sustainability

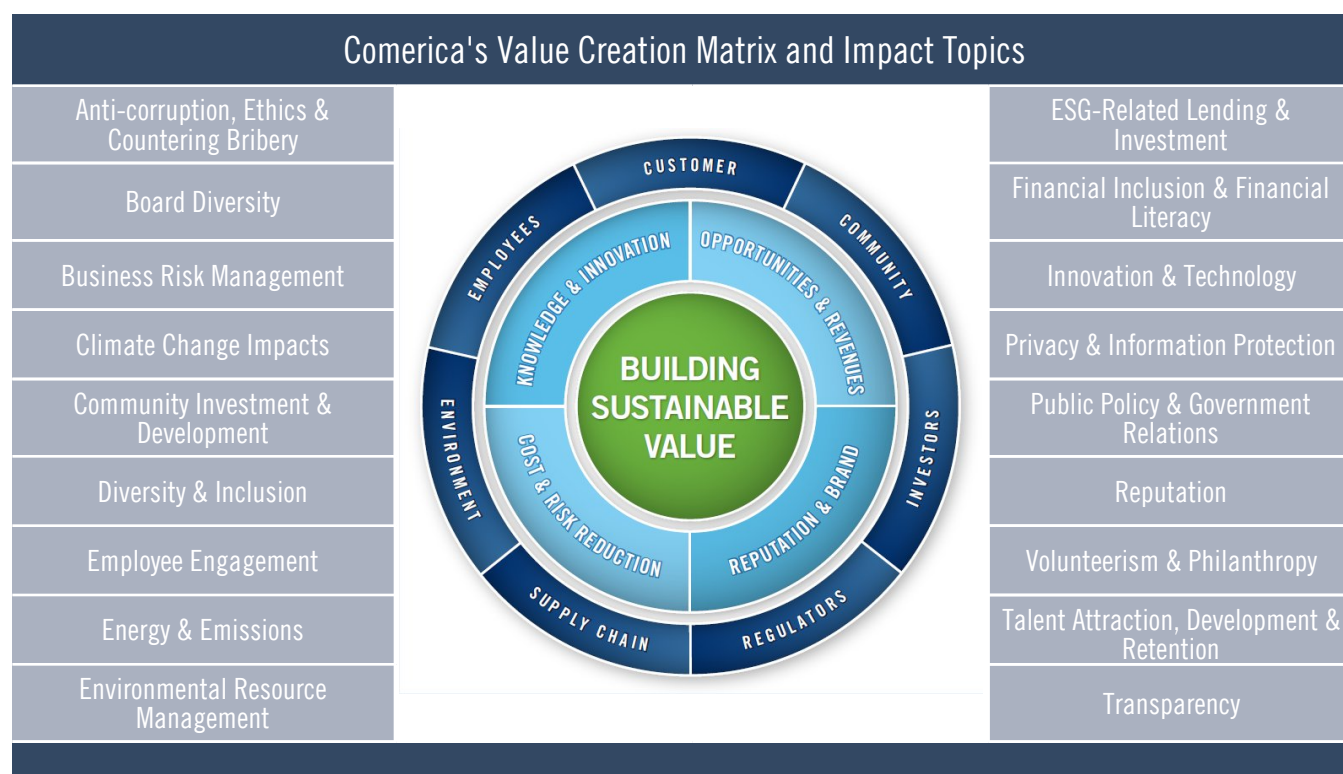


*J. Scott Beckerman
Senior Vice President and
Director of Corporate
Sustainability
Comerica Incorporated*

In 2018, we celebrated the 10th anniversary of the formation of Comerica's Corporate Sustainability Program. While we've been practicing corporate responsibility since our founding 170 years ago, this past decade has helped us move beyond simply delivering results and demonstrating progress. It has helped put us on a more sustainable path and moved us closer to a future where everyone can thrive. At Comerica, we understand sustainability is about harnessing our greatest minds and technologies to deliver this kind of future, and this report provides a guidepost to summarize our sustainability successes and challenges. We have made broad-based progress over the last decade. Our culture of diversity and inclusion continues to enrich our experiences and enhance our success. Comerica's strong corporate governance has sustained us through numerous business cycles and enhanced returns for our stakeholders.

Our compass throughout this decade has been our Value Creation Matrix. We look to this to guide our progress with reminders of the importance of our diverse stakeholders. Though our actions remain rooted in our value creation approach, we've refreshed our sustainability stakeholder engagement and our impact assessment process for this reporting cycle to better direct our actions and share our progress.

We also streamlined our impact topics using advanced data analytics validated by direct internal and external engagement. The result is a refined Environmental, Social and Governance (ESG) Impact Matrix that highlights our understanding of the importance of issues both inside our organization and in our broader stakeholder community.



We find ourselves in a time where we have advanced on many social, environmental and technology issues; however, there are still challenges ahead. For example, technology has enabled massive shifts in the way we live and do business, but also present risks to our ongoing security. Although progress is steady on many environmental issues, the fact is that as a global community, we are not on a sustainable path. We need continued, broad-based actions and being a responsible corporate citizen is more important than ever. At Comerica, we are committed to doing our part. For example, our most recent greenhouse gas (GHG) reduction goals, set in

2018 after early achievement of previous goals, put us on the path to eliminating our real estate-based emissions entirely by 2050. We've come far, however, we still have a long way to go.

The saying "if you want to go quickly, go alone; but if you want to go far, go together" applies to our sustainability journey. At times, our progress has moved quickly. But as we look to the future, we need to go far and we'd like to go together. We will do this by sharing our results and what we've learned, and by offering our products and services in a way that supports a more sustainable future.

As ESG-issues have become mainstream, consumers, employees and investors are looking for brands that support their journey. Our stand is this: we want people to thrive. When our communities are healthy, the environment protected and diversity and inclusion welcomed, individuals and businesses have a space to thrive. Comerica's goal is to help people and businesses working in this climate to be successful; to thrive. Thriving communities, thriving financial health, a thriving economy and a thriving planet - that's a world we want to live in and one we want for the generations that will follow us. I am confident that, if we work together, we can move toward a sustainable and thriving world we can all enjoy.

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 or visit us at [Comerica.com/sustainability](https://comerica.com/sustainability). By sharing your thoughts, you can help us improve our performance and further *raise your expectations of what a bank can be*.

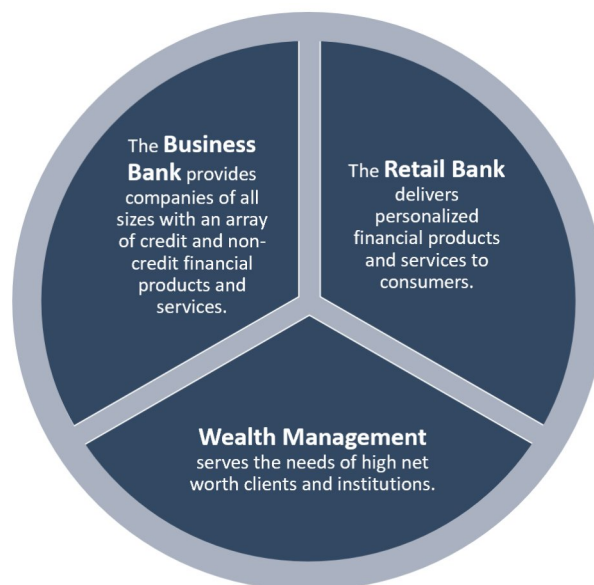
OUR COMPANY

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.

For 170 years, our colleagues have focused on building long-term relationships and delivering the highest quality financial services. At year-end 2018, Comerica served approximately one million customers. Comerica is strategically aligned into three business segments (see graphic to right).

As of December 31, 2018, our total assets stood at \$70.8 billion, total loans at \$50.2 billion and total deposits at \$55.6 billion. Additional metrics are provided in the [Key Statistics Table](#) attached to this report and in Comerica's [2018 Annual Report](#).

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



Comerica At A Glance: 2018

| | |
|---|---|
| Among the 25 largest U.S. financial holding companies | Highest concentration of commercial and industrial (C&I) loans among the top 25 U.S. financial holding companies (as of 12/31/18) |
| 435 U.S. banking centers and 584 ATMs concentrated in Michigan, Texas, California, Arizona and Florida (as of 12/31/18) | Located in seven of the 10 largest cities in the U.S.: Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose |
| No. 3 pre-paid commercial card issuer ¹ | Approximately 8,000 employees |

Comerica Attributes

| | |
|-------------------------------|--|
| Long History | Founded in 1849 |
| Nimble Size; \$71B in Assets | Products and services of a large bank with the culture of a community bank |
| Attractive Footprint | Strong presence in Texas, California and Michigan |
| Primarily a Business Bank | Complemented by Retail Bank and Wealth Management |
| Relationship Banking Strategy | Trusted Advisor Approach |
| Conservative | Strong capital position, prudent credit underwriting |

¹HSN Consultants, Inc., The Nilson Report, 12/31/18

Supply Chain

At Comerica, we engage with our supply chain and appropriately manage the risks and opportunities it presents. We endeavor to broaden our positive impacts on the environment and communities by influencing our suppliers and promoting a sustainable supply chain. We consider both [supplier diversity](#) and the [sustainability practices of suppliers](#) during our rigorous, seven-step sourcing process for selection and regular evaluation. Our Green Procurement Work Group looks to source suppliers and services that meet our [environmental criteria](#) where possible.

Comerica has approximately 4,400 active suppliers and an annual supplier spend of over \$620 million dollars, 65 percent of which is with our top 100 active suppliers. Forty-three percent of our supply base (by number of suppliers) and 30 percent of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,100 suppliers in Michigan and 800 suppliers in Texas.

Comerica primarily does business in the United States and has no significant presence or investment in countries where there is a known lack of human rights protection. Accordingly, we do not screen suppliers or investments specifically for human rights issues at this time.

Comerica Promise

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



Comerica's seven Core Values underpin our mission and vision and are instrumental in fulfilling our promise. Our Core Values of Customer-centricity, Collaboration, Integrity, Excellence, Agility, Diversity and Involvement reflect our commitment to corporate responsibility and are highlighted throughout this report. For example, our colleagues demonstrate Involvement as they participate in green office team activities and volunteer in their communities, and we strive to develop a workforce rich in Diversity as Comerica is regarded as a diverse employer of choice.

| <i>Comerica Core Value</i> | <i>What the Core Value Means to Us</i> | <i>Examples of Living Our Core Values</i> |
|----------------------------|--|---|
| Customer-centricity | Our decisions will be based first and foremost on what is best for our customers. | Supporting Small Businesses: Comerica Small Business Resource Center - Customers |
| Collaboration | We will work as a team to do what is right by our customers and our colleagues. | Comerica Volunteers In Our Communities - Volunteerism |
| Integrity | We will maintain the highest ethical standards through our honesty and transparency. We will honor our commitments and take personal responsibility for our actions. | Comerica's Transparency Impacts & Where to Find in Comerica's Public Reports - Corporate Governance |

| <i>Comerica Core Value</i> | <i>What the Core Value Means to Us</i> | <i>Examples of Living Our Core Values</i> |
|----------------------------|--|---|
| Excellence | We understand there are no trade-offs or short cuts on the road to success. We will strive for greatness through continuous self-improvement. | Comerica Accepts Climate Leadership Award for Excellence in GHG Management - Energy and Emissions |
| Agility | We aspire to become a company that fully embraces innovation as a means of driving ongoing growth and prosperity. We remain flexible and adaptable to change. | The Eye on Innovation Award Recognizes the Creative Use of Technology - Innovation & Technology |
| Diversity | We will create an environment that celebrates the differences among our colleagues and customers, with the understanding that such differences make us a stronger company. | Comerica's Employee Resource Network Groups - Employee Diversity & Inclusion Engagement |
| Involvement | We embrace our critical role in the communities we serve and acknowledge that our success is intertwined with theirs. We will make sustainability a priority. | Supporting Waste Management Research and Education - Engaging Our Communities on Sustainability |

Financial Performance

In 2018, we made definitive progress for Comerica underscored by our strong financial performance and solid capital position. Details of Comerica's financial performance are provided in our [2018 Annual Report](#) and summary information is provided in the [Key Statistics Table](#). For more information on our financial performance, disclosures and management processes, see an overview of performance highlights in the box below, as well as the [Investor Relations](#) section of Comerica.com.

2018 Financial Performance Highlights (comparisons to 2017)

- Grew net interest income 14 percent as we skillfully managed loan and deposit pricing as interest rates rose throughout 2018.
- Aided by our GEAR Up initiatives, increased customer-driven fee income, such as card, fiduciary and brokerage fees.
- Total revenue increased to an all-time high, surpassing last year's record.
- Improved our efficiency ratio to 54 percent as a result of robust revenue growth combined with tight expense control, which was aided by our GEAR Up initiatives.
- Strong credit quality was evidenced by the continued reduction in criticized loans, which were at very low levels. Net credit-related charge-offs were 11 basis points of average loans. This resulted in a decrease of \$75 million in our provision for credit losses, from a provision of \$74 million in 2017 to a \$1 million benefit in 2018.
- Achieved a 24 percent increase in pre-tax income.
- A \$191 million decrease in the provision for income taxes resulted from the impact of a lower statutory tax rate due to tax reform and a \$120 million decrease in discrete tax items, partially offset by an increase in pre-tax income.
- Drove net income to \$1.2 billion, an increase of \$492 million, or 66 percent, as well as a 74 percent increase in earnings per share, to a record \$7.20.
- Repurchased 14.8 million shares of common stock under our equity repurchase program. Additionally, increased our dividend 69 percent to \$1.84 per share and, subsequent to year-end, increased the quarterly dividend further by 7 cents per share, payable April 1, 2019. Altogether, we returned \$1.6 billion to shareholders in 2018, an increase of \$903 million.

Economic Environment

The economic performance of the U.S. and the markets in which we operate affect our customers and our own financial performance. While we have limited ability to influence the broader economic environment on our own, we can and do actively manage the associated risks to our company. We use ongoing stress testing and sensitivity testing to provide insight on how changes in the economic environment may impact our company. Our close relationships with customers and a deep understanding of their business needs, along with Comerica's strong leadership and conservative business approach, positions us well to navigate the economic cycles.

The U.S. economy enjoyed solid growth through 2018. Real GDP expanded by 2.9 percent for the year. Payroll job growth was strong, averaging over 223,000 net new jobs per month for the year. Strong job growth brought the unemployment rate down from 4.1 percent in January 2018, to 3.9 percent in December 2018.

In terms of financial policy, inflation was moderate, as shown by the Consumer Price Index which was up 1.9 percent in December 2018 (over December 2017). The Federal Reserve gradually tightened monetary policy over the year, increasing the fed funds rate range by 25 basis points in March, June, September and December, finishing the year with a target of 2.50 percent. Also, the Federal Reserve continued to wind down its balance sheet through the year by curtailing the reinvestment of maturing assets. While 2018 was a positive year for the U.S. economy overall, conditions changed in the fourth quarter as financial market volatility increased and global economic growth started to cool.

Financial Outlook

Comerica's long-term approach to delivering value has positioned us well for the future. Throughout 2018 and beyond, we believe Comerica's relationship banking strategy, combined with our diverse geographic footprint, will enable us to build long-term shareholder value. An overview of the key attributes Comerica is leveraging to consistently produce a solid financial performance can be seen in the following table.

| | |
|--------------------------------------|--|
| A Leading Bank for Business | #1 Commercial Lender (% of total loans) ¹ , complemented by Retail Bank & Wealth Management |
| Relationship Banking Strategy | Deep expertise in specialty businesses, long tenured employees |
| Growing Revenue | Positioned in faster growing markets & industries |
| Highly Efficient | GEAR Up leveraged technology, increasing capacity to support growth |
| Superior Credit Metrics | Conservative underwriting, diverse portfolio |
| Strong Capital | Supports future growth, \$1.6B capital returned to shareholders (FY18) |

1. Source: S&P Global Market Intelligence; based on 3/31/19 regulatory data for domestic holding companies using C&I loans

Economic Impacts

Comerica has sustained our business for 170 years by delivering value to our customers and shareholders alike. As a bank, our financial performance and its associated economic impact is vital to our success across each of our Impact Topics. Our economic

impact goes beyond delivering value to our shareholders. It relates to our core value of involvement in the communities where we operate, and our financial performance effects our customers, suppliers, as well as our colleagues.

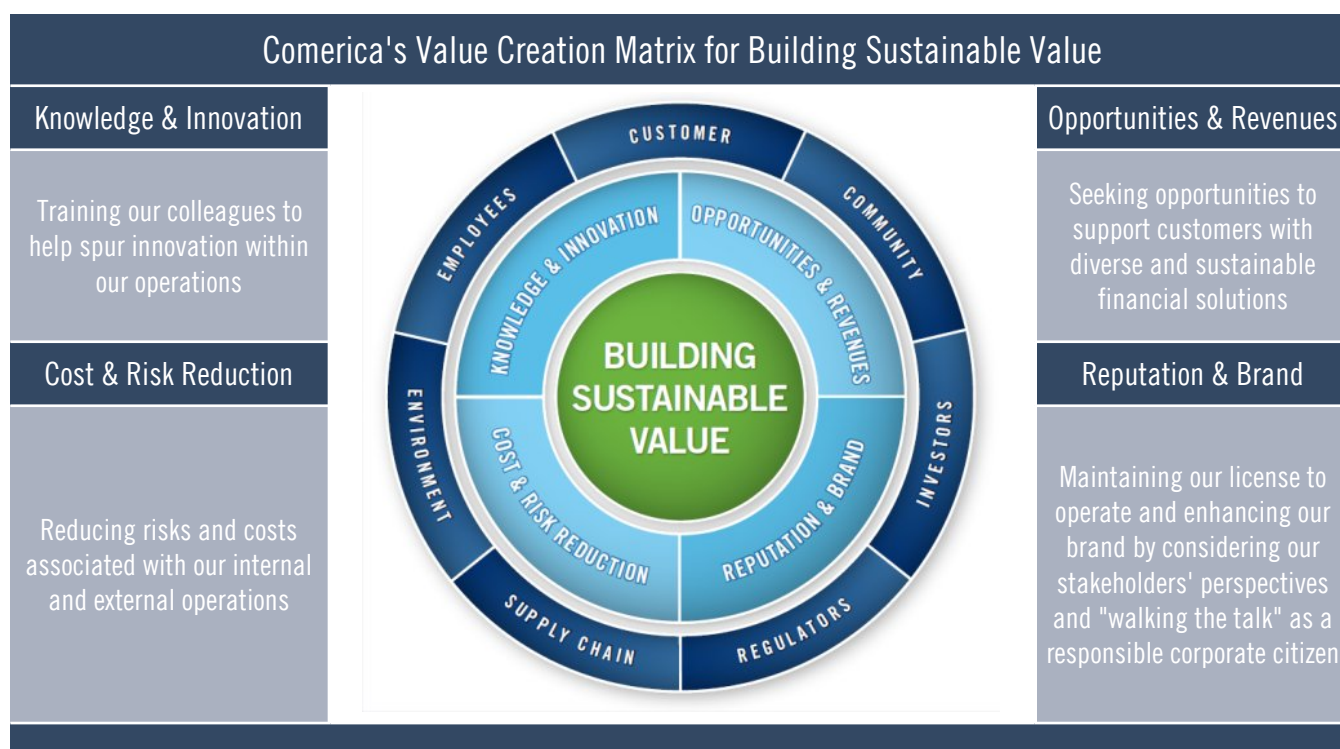
As a financial services company, there are numerous indirect economic impacts resulting from our business operations and the flow of money between Comerica and our customers and suppliers. For example, the positive economic impacts from our 125,000+ small business customers strengthen our local communities by maintaining and developing the core of the local economies in which we operate. More information and additional examples of positive indirect economic impacts associated with our business activities can be found on [Comerica.com](#) and in the following report sections:

- Community economic development activity (see [Community Investment and Development](#))
- Products and services to serve the underbanked (see [Financial Inclusion & Financial Literacy](#))
- Economic impacts created by our loans (see this section, [External Environmental Impacts](#))
- Employee volunteerism and nonprofit board service (see [Volunteerism](#))
- Supply chain spend (see [Supply Chain](#) and [Transparency](#))

On the other hand, Comerica understands that sometimes changes that are positive from a sustainability standpoint, such as reductions in our real estate footprint, can have indirect economic impacts on our communities. For 2018, we reduced our overall occupied square footage approximately seven percent compared to 2017. The reduction was primarily attributed to closing of facilities in our larger markets. This decrease was generally in line with previous years and it is not expected to have a significant negative economic impact on the associated communities as there are alternate Comerica facilities nearby capable of serving the needs of our customers.

Stakeholder Engagement and ESG Impact Assessment

Engaging with a broad range of stakeholders is critical to our long-term success. By communicating with and listening to our stakeholders, we expect to strengthen our business performance and build enduring sustainable value. Stakeholder engagement is also a foundational element of the GRI Standards that we report and is represented by the outer ring of our Value Creation matrix.



Since 2008, Comerica has formally engaged with stakeholders on ESG issues, typically on a biennial basis. Our most recent engagement, as described in this section, was initiated in 2018 and extended into 2019. Our ESG-based stakeholder engagement results are shared with the Comerica Incorporated Board via the Enterprise Risk Committee, typically on an annual basis. Given the broad nature of these topics, Comerica's leadership reviews the risks, opportunities, and impacts of the topics on an ongoing basis.

For a detailed description of how Comerica engages with stakeholders, our impact assessment process, and our impact matrix, see our report titled, [Environmental, Social and Governance Impact Assessment: Comerica's Stakeholder Engagement Process and Evaluation of ESG Topics](#) (ESG Impact Assessment). This report, to be updated in 2019, details how and why we engage with stakeholders, provides example stakeholder issues, and discusses our impact assessment process in detail. This includes our impact topics and their associated boundaries, Comerica's impact matrix and the relevant GRI Standards information supporting our process.

In addition to these sustainability engagements, the following table shows our regular stakeholder engagement methods.

| <i>Stakeholder Group</i> | <i>How We Engage</i> |
|---|--|
| Colleagues | Intranet communications, Sustainability Council, green office teams, individual meetings |
| Customers | Individual meetings, surveys, online communities, customer appreciation events |
| Environmental, Social and Governance-related Non-Governmental Organizations | Individual meetings, surveys, professional organizations |
| ESG Rating and Ranking Organizations | Individual meetings, surveys, professional organizations |
| ESG-Focused Investors/Impact Investors | Individual meetings, investor conferences/presentations, quarterly earnings calls |
| Industry | Industry organizations, professional organizations |
| Investors/Analysts | Individual meetings, regular updates, investor conferences/presentations, quarterly earnings calls |
| Media | Individual meetings, regular outreach via news releases, etc. |
| Peers | Industry organizations, professional organizations, individual meetings |
| Suppliers | Regular reviews, surveys, individual meetings |

As an example of ongoing stakeholder engagement, our Investor Relations team conducts shareholder outreach as an integral part of Comerica's business practices. We participate in investor conferences at least quarterly and periodically meet with investors at their offices or our Dallas headquarters. In total, we had nearly 300 meetings with investors in 2018 (this number includes multiple meetings with the same firm/individuals). Furthermore, shareholders provide insight on a variety of topics, including operations, governance and compensation. In that regard, in 2018 we reached out to our top 25 shareholders, representing approximately 52 percent of our shares, as well as a number of additional shareholders who expressed an interest in providing feedback or who had provided feedback in the past.

ESG Impact Assessment Process

To define those environmental, social and governance topics most relevant to our business, Comerica uses what we've termed an ESG Impact Assessment process, which has been refined and updated over time.

| Timeframe | Actions | Outcomes |
|-----------|---|--|
| 2014-2015 | Robust Stakeholder Engagement process defines relevant ESG topics and defines topic boundaries. | Produced Comerica's first Impact Matrix |
| 2016 | Reviewed Impact Topics with select internal leaders | Published Comerica's ESG Impact Assessment Report |
| 2017 | Reviewed Impact Topics with select external experts | Updated Comerica's ESG Impact Assessment Report |
| 2018-2019 | Benchmarked ESG reporting and topics. Conducted advanced data analytics, internal surveys, and internal and external interviews on Impact Topics. | Streamlined Comerica's Impact Topics and updated Comerica's Impact Matrix. Updated ESG Impact Assessment Report (to be completed in 2019). |

Collectively, our ESG Impact Assessment process shapes our reporting content and addresses the issues of relevancy, stakeholder inclusiveness, sustainability context and completeness under GRI Standards.

For reference, we use the terms "relevancy," "significance" and "impact" to refer to those topics that reflect the environmental, economic, social and governance issues most important to Comerica and our stakeholders; what the GRI Sustainability Reporting Standards defined 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 (see [Reporting Methodology](#) for additional information).

Impact Topics and Boundaries

Based on stakeholder feedback, with our most recent ESG Impact Assessment, we streamlined our Impact Topics from 27 to 18 topics. Our Impact Topic Boundaries are provided in Comerica's ESG Impact Assessment report and evaluate each Impact Topic for relevance to Comerica, communities, customers, investors, regulators and suppliers. References to the Impact Topics can be found throughout this report.

| <i>Impact Topic</i> | <i>Description</i> |
|--|---|
| Anti-corruption, Ethics & Countering Bribery | How we work to be an ethical corporation, work against corruption and counter bribery |
| Board Diversity | The diversity of our Board of Directors, including ethnicity, gender, and areas of experience |
| Business Risk Management | How we manage the risks associated with our business, including issues such as regulatory compliance, credit risks, environmental risks, responsible marketing, and disaster management |
| Climate Change Impacts | How we are impacted by the physical and business transition risks and opportunities associated with a changing climate |
| Community Investment & Development | How we support investment and development at the community level and the associated economic effects from our activities |
| Diversity & Inclusion | The importance of diversity and inclusion for our workforce, our suppliers, and the customers and communities we serve |
| Employee Engagement | How we work to engage our employees through a variety of teams, activities and actions |
| Energy & Emissions | The impact we have on the environment through our consumption of energy as well as greenhouse gas emissions associated with our operations and purchases |
| Environmental Resource Management | How we manage our use of resources including water, waste, and materials such as paper |

| <i>Impact Topic</i> | <i>Description</i> |
|--|---|
| ESG-Related Lending & Investment | Our business activities related to environmental, social, and governance |
| Financial Inclusion & Financial Literacy | Supporting education on financial matters and promoting accessibility of financial services |
| Innovation & Technology | How we advance innovation and deploy technology |
| Privacy & Information Protection | The integrity, availability, and protection of our company's and our customer's information |
| Public Policy & Government Relations | How we engage with various levels of government on public policy issues |
| Reputation | The collective perception of our company based on our conduct and business practices |
| Talent Attraction, Development & Retention | How we work to attract, train, compensate, and retain our employees |
| Transparency | Providing information to stakeholders regarding our financial and non-financial performance |
| Volunteerism & Philanthropy | Our engagement with and support of our communities and non-profit organizations |

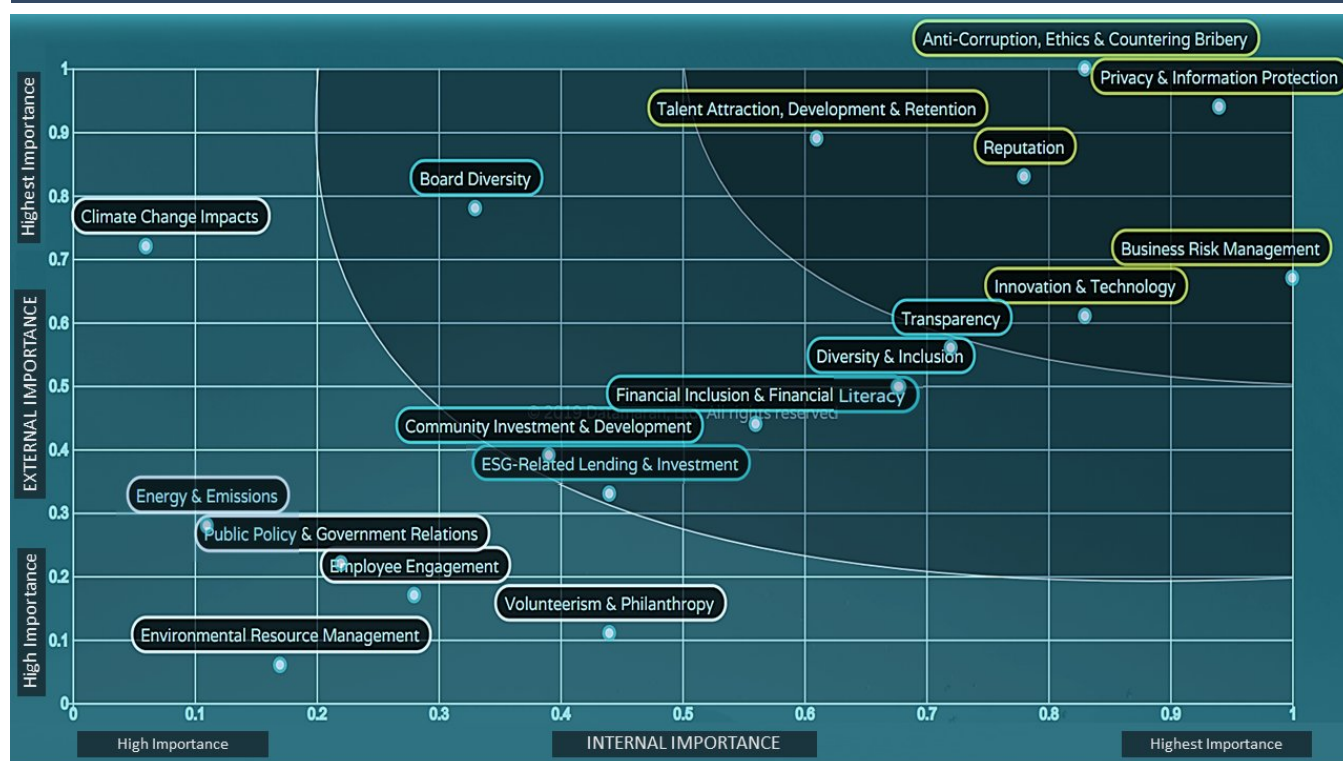
Our Impact Matrix

Our Impact Matrix, first published in our 2014 Comerica Sustainability Report, reflects our understanding of the relative significance of sustainability issues that most affect our business and our stakeholders. In 2018 and 2019, our Impact Matrix was updated with our streamlined topic list. Our process for constructing the revised matrix utilized the following:

- Foundation of Comerica's previous impact assessment work
- Internal survey of selected Comerica business unit leaders
- Internal interviews of selected Comerica executive leaders
- External interviews of selected sustainability subject matter experts
- Use of Datamaran's materiality software platform which employs artificial intelligence and natural language processing combined with advanced data analytics
- Review and sensitivity analysis using internal and external subject matter experts

For details regarding the development of the Impact Matrix, consult our ESG Impact Assessment Report at [Comerica.com/sustainability](https://comerica.com/sustainability).

Comerica Impact Matrix



The matrix includes the 18 impact topics identified as most important to internal and external stakeholders based on current and previous stakeholder engagement work. Topics are sorted on the vertical axis by external stakeholders' level of importance and on the horizontal axis by Comerica's level of importance. Topic groupings in the upper right portion of the matrix represent those topics of highest importance to both Comerica and our stakeholders. The Impact Matrix guides both in communicating our progress on these topics, and in further aligning our corporate priorities with the sustainability issues most relevant to our business.

Demonstrating Comerica's Actions Toward the Sustainable Development Goals

The United Nations 17 Sustainable Development Goals (SDGs) represent a generational opportunity to address the greatest challenges facing our planet. The SDGs are increasingly being used as a roadmap for businesses to demonstrate how they are meeting global development needs. Comerica recognizes our individual and collective efforts can have transformative impacts in assuring no one is left behind and improve the lives of all of our planet's inhabitants.





The following figure represents how the SDGs align with our primary reporting categories and underlying Impact Topics.

| <i>SDGs and Comerica's Impact Topic Reporting in our Corporate Responsibility Report</i> | | | | | |
|--|--|---|------------------------------------|--|--|
| Customers | Responsible Business | Colleagues | Diversity and Inclusion | Environment | Community |
| 4 QUALITY EDUCATION | 10 REDUCED INEQUALITIES | 3 GOOD HEALTH AND WELL-BEING | 5 GENDER EQUALITY | 6 CLEAN WATER AND SANITATION | 1 NO POVERTY |
| 7 AFFORDABLE AND CLEAN ENERGY | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | 4 QUALITY EDUCATION | 10 REDUCED INEQUALITIES | 7 AFFORDABLE AND CLEAN ENERGY | 2 ZERO HUNGER |
| 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE | 16 PEACE, JUSTICE AND STRONG INSTITUTIONS | 5 GENDER EQUALITY | | 13 CLIMATE ACTION | 4 QUALITY EDUCATION |
| 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | 17 PARTNERSHIPS FOR THE GOALS | 10 REDUCED INEQUALITIES | | 14 LIFE BELOW WATER | 8 DECENT WORK AND ECONOMIC GROWTH |
| | | | | 15 LIFE ON LAND | 11 SUSTAINABLE CITIES AND COMMUNITIES |

A company can make progress on the SDGs across the value chain by both increasing the positive and minimizing the negative impacts. We understand that while we have impacts in all 17 areas, our priority SDGs relate to those outcomes where the SDGs are most relevant or most impactful to our business. The SDGs strongly parallel our corporate responsibility efforts in a number of areas. For example, our work on improving financial literacy supports our customers and the SDG of Quality Education, and our efforts on diversity and inclusion support our colleagues and the SDGs of Gender Equality and Reduced Inequalities.

As suggested by the report "Integrating the SDGs Into Corporate Reporting: A Practical Guide," we have preliminarily identified and prioritized the following SDGs and corresponding targets.

|  | Corresponding SDG Target | Comerica Example |
|---|---|--|
|  | <p>4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.</p> | <p>Financial literacy training is a key focus of Comerica's volunteerism efforts and we provide this educational experience for children as well as adults, promoting lifelong learning. In addition, programs like Comerica Works, Money \$ense and the Comerica Small Business Resource Center provide financial and business skills to build technical knowledge and support entrepreneurship (see the Customers section for additional information).</p> |
|  | <p>5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.</p> | <p>At Comerica, 66 percent of employees and 51 percent of officials and managers are women (see Employee Demographics) and programs such as Comerica's Women's Business Symposium (see Customer Education) support advancement of women in business.</p> |
|  | <p>6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity.</p> | <p>Comerica has reduced water consumption 27.6 percent (vs. 2012), reducing our demands on the water supply (see Water Stewardship).</p> |
|  | <p>7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.</p> | <p>Green lending at Comerica includes relationships with companies that are advancing renewable energy and the critical technologies and supporting services for this sector (see ESG-Related Lending & Investment).</p> |
|  | <p>8.10 Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.</p> | <p>Financial inclusion is core to our objective of serving our customers. Examples include specific products to serve the underbanked, offering options for our non-English speaking customers and serving as the Financial Agent for the U. S. Treasury's Direct Express® Debit MasterCard® Program to deliver government benefits electronically (see Financial Inclusion & Financial Literacy).</p> |
|  | <p>10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.</p> | <p>Diversity is a Core Value at Comerica and we are committed to embracing inclusion of all, regardless of differences in beliefs, experiences, backgrounds or physical characteristics (see Diversity and Inclusion).</p> |

|  | Corresponding SDG Target | Comerica Example |
|---|--|--|
|  | 12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse. | Not only does Comerica work to reduce our own waste generation, we support companies in the waste minimization and recycling businesses through our Environmental Services Group (see Environmentally Beneficial Lending and Environmental Resource Management) |
|  | 13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning. | Comerica's Master of Sustainability Awareness program teaches colleagues about the impacts of climate change and motivates them to take appropriate climate action at home and at work (see Employee Engagement). |
|  | 15.a. Mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems. | Environmental Risk Management processes at Comerica help ensure environmental issues are managed appropriately (see Environmental Risk Management). |

Comerica recognizes that a thriving planet with vibrant communities, inclusive economies and a healthy environment supports our business success, and as we move toward 2030, the 17 SDGs provide a roadmap we can follow. We will continue to monitor our business and operations as they relate to the SDGs and, in the future, we may also look to establish additional goals around our priority SDGs and the corresponding SDG Targets.

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*.

Our aim to put our customers at the center of our work guides our actions across a broad range of our impact topics. We are focused on safeguarding our customers' privacy and financial information to protect their interests and give them peace of mind. Innovation and the adoption of new technology enhances our ability to protect our customers' privacy and deliver new products, services and delivery channels. Our customer-centricity core value also includes educating our current and prospective customers on financial literacy and understanding which products and services will meet their current and future needs, in addition to striving to help the communities in which we operate by identifying unmet needs and developing products and services to improve banking access.

| | |
|-----------------|--|
| 2018 PROGRESS | Implemented advanced threat detection enhancements for web-facing customer applications as part of our continued monitoring of the evolving cyber threat environment |
| | Enhanced our products and services using technology and innovation |
| | Delivered additional education and engagement resources for customers using platforms such as Insights on Comerica.com |
| 2018 CHALLENGES | Balancing our customers' needs between traditional and innovative delivery of banking products and services |
| | Emerging and rapidly changing threats to customer privacy and cybersecurity |
| | Addressing the variety of financial education needs of a diverse customer base using the most effective delivery channels |

Our Lines of Business

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

To meet the evolving needs and desires of our customers, we work to enhance our offerings and regularly provide new products and services. In 2018, supporting our customers included a wide variety of activities and developments.

New and Enhanced Product and Services Examples

| | |
|--|---|
| Improved Treasury Management Products and Services | Transformed Customer Contact Center |
| Upgraded Customer Relationship Management Tools | Re-imagined Comerica Wealth Management Experience |
| Roll-out of Zelle ® for Person-to-Person Payments | Enhancements to Investment Management, Including Socially-Responsible Options |
| Upgrading ATMS and Interactive Teller Machines | Comerica Securities Mobile Application |

At Comerica, we are committed to helping small businesses grow and prosper. Our banking centers are located in areas where small business customers are concentrated. We also have a relationship-based small business banking group dedicated to supporting those businesses with \$2 million to \$30 million in revenues. In 2018, we had more than \$1 billion in new small business loan commitments and our Small Business Administration (SBA) lending, including government-guaranteed 7a and 504 loans, totaled \$124 million.

Supporting Small Businesses: Comerica Small Business Resource Center

Small businesses are key to the foundation of a strong community and provide its unique identity. Comerica recognizes the value and importance of supporting small businesses in our local markets. In 2018, Comerica created the Comerica Small Business Resource Center in Riviera Beach to deliver business training and support to drive success in the local community. We sponsored the program and partnered with community organizations to help deliver specialized training to small businesses and entrepreneurs in this south Florida community.

These business owners, the majority of whom represented diverse populations, were provided key training on topics such as:

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

At the conclusion of the training, graduating business owners were joined by the local mayor and city council members in recognition of their efforts and their importance to the community.



Comerica colleague David Kunik and the graduates of the Business Readiness Certification Training program.

Privacy & Information Protection

Impact Topic

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. As we are committed to maintaining our customers' trust, we continually evaluate and improve our cybersecurity systems to safeguard customer information, protect against fraud attempts and provide the highest level of safety and protection. We face 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 these risks, see Item 1A in our [2018 Annual Report](#).

Privacy and information protection, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Enterprise Information Protection Framework.

Enterprise Information Protection Framework

| | | |
|-------------------------|-----------------------|---------------------|
| Strategy and Governance | Risk Management | Controls Training |
| Monitoring and Testing | Response and Recovery | Program Maintenance |

Enterprise Information Protection Framework Goals

| |
|--|
| • Protect valuable information and information technology resources |
| • Ensure the security and confidentiality of customer records and corporate information |
| • Protect against unauthorized access to or use of such records |
| • Detect, prevent and mitigate identity theft in connection with covered accounts |
| • Provide security protections that are consistent with the value of the information asset |
| • Protect the legal position of the company |
| • Ensure compliance with regulatory guidelines for protecting information assets |

To evaluate the program's effectiveness, business units conduct risk control self-assessments, external regulatory examiners carry out comprehensive evaluations, and we implement three lines of defense built on internal audits, oversight and effective challenge, and our continuous monitoring program. The Enterprise Risk Committee of Comerica's Board of Directors oversees the program's overall status, effectiveness of policies and procedures, material risk issues, risk management, control decisions, and service provider oversight. The committee also reviews management responses to security incidents, including those involving identity theft or personal health information, and recommendations for program changes. The program is administered by our Chief Risk Officer, Chief Information Officer, Chief Information Security and Operational Risk Officer and Chief Cybersecurity Officer who all work closely with the Enterprise Risk Committee to monitor and continuously improve the program in response to changing risk environments.

We continue to proactively enhance our policies and programs in this arena through Comerica's Enterprise Risk strategy by taking advantage of new technology infrastructure and data quality improvements to both protect our customers from emerging and evolving threats and to stay ahead of changing regulatory requirements. Specific actions we have taken include enhancing our advanced threat detection for web-based customer applications. In addition, we refined our technology lifecycle management. Specifically, we implemented functionality in 2018 to identify electronic records maintained in email, allowing systematic purge of emails upon retention expiration. We also began implementing functionality to identify and systematically purge electronic records maintained in other corporate repositories. These technology enhancements will support more effective information management practices and adherence to the corporate Information Lifecycle Management (ILM) Policy and Standards.

While we work diligently to protect our customers' information and privacy, we also provide resources to assist our customers in better protecting themselves. This tool on Comerica.com includes summaries of common fraud scams, special alerts to advise customers of known fraud activity and a link for customers to promptly report suspected fraud. Click on the following tabs for more information:

Comerica's Fraud Center

(click the links below for more information)

[Report Fraud](#)

[Fraud Scams](#)

[Fraud Defense](#)

Comerica Bank
Fraud Center



Incidents that may pose privacy concerns are noted when customers inform our employees or when employees realize an incident has occurred prior to notification by the affected customers. Most often, these incidents involve a deposit to, or withdrawal from, an incorrect account or the mailing or emailing of information to the wrong person. In 2018, our employees noted 49 situations where a customer's personal information was disclosed to a third party without the customer's consent, as compared to 60 situations in 2017. Comerica was not subject to fines or non-monetary sanctions in 2018 for non-compliance with personal protection data laws, nor were there any breaches of customer information by our company that would have a material adverse effect on our operations or ability to perform the services we offer.

To safeguard our customers, we educate our colleagues and provide them the resources they need to act as a strong first line of defense. We require colleagues to take Comerica's online Information Privacy and Protection training annually. We also review and update the program every year and track completion. In 2018, 99.9 percent of our colleagues completed the training. Key topics in 2018 included information protection and privacy, identity theft, ILM, and the Code of Business Conduct and Ethics for Employees, among others.

Moreover, we ensure that information confidentiality is maintained throughout its lifecycle, from the time we receive it through its secure storage and destruction. Comerica's ILM Policy and Standards outline the appropriate procedures to prevent unauthorized access, proper retention, modification, disclosure, and destruction of corporate information. In 2018, 99.9 percent of required colleagues also completed this ILM training. We perform audits and compliance checks on our ILM Standards, including the Secure Destruction Program for managing paper documents and electronic equipment, which complements our recycling efforts (See [Environmental Resource Management](#)).

Preventing Elder Abuse

Bankers are often the first to identify potential financial exploitation of vulnerable customers. At Comerica, raising awareness about the financial exploitation of the elderly and vulnerable adults remains a priority and is a reflection of our core values. According to the National Center on Elder Abuse, at least one in 10 elders are abused, neglected, or financially exploited, and many more cases go unreported. Family members are the most common perpetrators of the financial exploitation of older adults, followed by other known individuals, such as friends, neighbors and home care aides. Elders are estimated to lose \$2.6 billion annually due to financial exploitation.

To help address this social issue, Comerica provides training on Financial Exploitation of the Elderly and Vulnerable Adults, which 99.9 percent of relevant employees completed in 2018. This course trains colleagues to detect red flags and act appropriately so as to protect our customers from financial loss.

Innovation & Technology

Impact Topic

The digital revolution we are experiencing today is marked by a fusion of technologies that is blurring the line between the physical and the digital world and creating opportunities for digital disruptions soon after technological capabilities are introduced. Recognizing the significance of this rapidly evolving digital revolution, Comerica introduced a new initiative in 2018 to use technology and innovation to enhance and transform our business, while also assessing opportunities to use technology to constructively disrupt processes and create capabilities for stronger growth in the future.

Throughout 2018, Comerica initiated several new programs designed to push the boundaries of innovation and simultaneously support the high-performance culture within our organization. These programs form part of Comerica's TechVision 2020, a multi-year strategy comprised of 10 focus areas across two dimensions: Transforming our Future and Strengthening our Core.

TechVision 2020 Goals



Our guiding principle is to deliver customer-centric products and services with speed and agility, with embedded security and compliance, at an optimal cost as well as empowering our talent.

| Transforming Our Future | Strengthening Our Core |
|------------------------------------|--|
| Agile Delivery Transformation | Security, Risk and Compliance |
| Data and Advanced Analytics | Continuous Experimentation |
| Digital and Channel Transformation | Platform and Application Rationalization |
| Software-Defined Computing | Technology Investment Management |
| Process Automation | Talent and Culture |

Under Comerica's TechVision 2020, our technology investments will help drive an integrated strategy through which we can develop core competencies and transform operations. Cybersecurity is an essential component of our technology strategy and is focused on prevention and protecting us from cybersecurity issues that threaten customer privacy or security (see [Privacy & Information Protection](#)). Our technology investments also focus on enhancing our customer service offerings by providing deeper insights into our customers' requirements as well as increasing efficiency across our operations. We plan to continue making technology investments where we identify potential improvements to our products and services, which can enhance colleague and customer experience, promote business growth, and improve controls and compliance.

We strive to become the leading digital provider of choice for our customers through innovation, exploration and collaboration. When it comes to technology and innovation, we recognize the future is now.

| | |
|---|---|
| Innovation: | Exploration: |
| Comerica has developed a vision for innovation, and this vision will be achieved through our sustained investment in modernization and commitment to transformation. Given the scope and speed of evolution in regulation, customer behavior and technology, we recognize banking in the future cannot simply be a continuation of banking as it has been. Accordingly, we are creating new products and innovations through a collaborative model with technology and business partners across the organization. | Comerica has embarked on a journey of continuous, experimental innovation across a diverse range of emerging technologies, such as blockchain, digital and adaptive lending, enhanced mobility, and peer-to-peer and social investing. Through the adoption of human-centered design and an agile development framework, we have been able to accelerate the development of prototypes, proof of concepts and minimum viable products. In addition, we have developed new products, services and experiences for our customers. |
| Collaboration: | The Future is Now: |
| Comerica recognizes that collaboration drives innovation. We understand the importance of establishing and nurturing strategic partnerships in order to share and develop new perspectives and ideas. As such, we have continued to collaborate on initiatives with start-ups, universities, technology incubators and venture capital firms. | Comerica remains committed to discovering new, significant and sustainable sources of revenue. We aim to develop and implement robust, industry-specific strategies that are designed to provide exceptional service, as well as intuitive, engaging, and valuable experiences and capabilities to our customers. |

2018 New Product and Innovation Examples - Preparing for a New Age in Banking

| Increasing Efficiency & Reduce Risk | | Uplifting the Customer Experience & Growing Revenue | |
|---|---|---|--|
| New End-to-End Credit Platform | Integrated Cloud Security & Resiliency | Banking Center Transformation | New Teller Platform Experience Design |
| Business Process and Robotics Platforms | New Consumer Loans & Mortgages Platform | Comerica Business Portal Upgrade | Retail Mobile App with Integrated Alerts |
| Cloud Platform and Migrations | New Customer Relationship Platform | Contact Center Transformation | Same Day ACH Debits |
| Data Lake Platform | New EMV-enabled Debit Cards | Customer Migration to Soft Tokens | Treasury Management Connect Mobile & Information Reporting |
| Dealer Floorplan Upgrade | New End User Colleague Technologies | Data Driven Attrition Reduction Program | Treasury Management Connect Payments |
| Fraud Detection Platform | Service Desk Automation | Digital Retail Transformation Design | Upgrade Business Deposit Capture |
| FX Sales System Upgrade | Wholesale Lockbox Upgrade | Marketing Analytics Platform | Zelle® Real Time Payments |

Comerica's technology innovations have been recognized in 2018 through awards and publications. For example, Comerica's Two-in-a-Box Product Management approach was published by Gartner as one of the best practices for building digital products with high collaboration and agility.

Eye on Innovation Award Recognizes Creative Use of Technology

Comerica was recently selected as a finalist for Gartner's prestigious Eye on Innovation Award for our use of Virtual Reality technology in Financial Services. The Eye on Innovation Award recognizes the innovative use of technology and highlights best-in-class industry initiatives as vital catalysts for institutions becoming digital businesses. In recognition of this exciting and important work across the industry, the annual awards were presented to executive honorees at the Gartner Symposia. To achieve this recognition, Comerica Retail Operations, Learning and Development, and Innovation teams partnered to conduct a Virtual Reality training session using simulated engagement with "customers" in Retail Bank scenarios (Consumer Lending, Credit Card Knowledge and Digital Offerings). Colleagues interacted with emotive avatars controlled by human actors with voice modulation capabilities. The teams used simulations of situations requiring authenticity and presence, and learners interacted with the avatars in fully immersive VR or via their camera-enabled computer.

In essence, Virtual Reality connects and engages participants at deeper and more meaningful levels, helps colleagues improve their productivity and performance, and creates entirely new ways for people to experience the world around them.

Virtual Reality Training Advantages:

- Immersive training simultaneously engages emotional and cognitive processes
- Targeted scenarios focus on specific objectives, and isolate critical challenges
- Iterative practice solidifies skill through spaced repetition
- Immediate feedback allows learner to adjust effort and performance based on results
- Learners can practice skills with confidence, knowing the encounter is simulated



Secure Cloud Program Enhances Performance



Through collaboration across the organization and in alignment with regulators and suppliers, Comerica delivered 100 applications in the Secure Cloud over three quarters in 2018. This enables faster delivery of new capabilities, higher agility and superior technology risk management.

Comerica also advances innovation through collaborative partnerships, such as:

- **University Partnerships:** Comerica has established robust relationships with premier colleges and universities throughout the country by continuing to mentor teams of undergraduate and graduate students focused on analyzing complex topics

in business and technology as part of the academic curriculum and participating in a number of university Hackathons. In 2018, a member of Comerica's Innovation team was appointed as a member of the President's Development Board (Ex-Officio Member) and as Chair of Dean's Industry Advisory Council (School of Arts, Technology and Emerging Communication-ATEC) for the University of Texas at Dallas.

- **Silicon Lakes:** Working in partnership with many of the premier organizations in the Detroit metro area, Comerica has been highly instrumental in the launching of an innovation initiative known as the Silicon Lakes which is a digital community effort focused on driving the technology revolution in Detroit and establishing a leading digital hub in the Great Lakes region.
- **inForum Technology NEXT:** The Comerica Technology team continued their work to inspire female leadership in information technology by hosting an inForum technology NEXT event. inForum is a professional organization in Michigan that combines strategic connections, professional development programs and research, to increase talent initiatives for companies and advance technology careers for women.
- **Tech Titans:** A member of Comerica's Innovation team has served as an Innovation team Tri-Chair since 2017 and co-leads the Digital Disruption series for Tech Titans, formerly known as the Metroplex Technology Business Council. The largest technology trade association in Texas, this group represents a quarter million employees through its 300-member companies. Tech Titans strengthens the North Texas technology community by acting as the innovation hub for entrepreneurs, universities and corporations.

Advancing Women in Technology

Comerica remains committed to the advancement of women within our organization and particularly within our departments working in technology. The technology sector has traditionally been a male-dominated sector, so we have created a focus on gender parity to help ensure women not only have equal opportunities but also to help ensure the realization of truly innovative products and services that gender diversity delivers.

We have also strengthened our partnerships with organizations like the Michigan Council of Women in Technology (MCWT) to help promote the important role of women in technology. In addition, Comerica has hosted International Women's Day events in recent years to celebrate women's achievements, raise awareness against bias and take action for equality.



"We are extremely excited about Comerica's engagement with MCWT. Over the past year, Comerica delivered on a highly successful ConnectNet professional networking session for MCWT members, centered around the theme 'the compassionate leader.' Comerica Chief Information Officer Sangy Vatsa and a team of leaders facilitated the discussion and shared their personal stories and insights. More recently, several women leaders from Comerica attended MCWT's Executive Connection Summit which included a full day of speakers, breakout sessions, leadership, and technology content. Through these activities, Comerica has continued to demonstrate its support for women in tech."

- Chris Rydzewski, Executive Director, Michigan Council of Women in Technology (MCWT)

Customer Education

Comerica's Trusted Advisor approach relies on understanding our customers' needs and providing differentiated insights and distinctive services tailored to each customer to support their long-term success. In today's highly competitive market, our ability to offer products that match the needs of our clients is crucial to our success. Our colleagues understand that providing clients with the right products doesn't start with selling, rather, it starts with identifying needs and offering value-based solutions. This includes serving those with limited access to banking to the increasingly complex requirements of our business and wealth clients.

Our core value of customer-centricity is about taking the time to understand the financial and cash management challenges our customers face and which of our products and services best meet their needs. By making thoughtful, deliberate investments in our people, products and processes, we work to provide our colleagues the support to truly and consistently raise customer expectations. Integrating the Trusted Advisor approach into everything we do allows us to better deliver on the [Comerica Promise](#).

Comerica's 2018 Women's Business Symposium Events

Thirteen years ago, Comerica's Women's Initiative Committee established the Women's Business Symposium, an annual educational event that includes seminars and networking opportunities for colleagues and business women from a range of industries.



In 2018, we held one-day Women's Business Symposium events in Detroit, Michigan; Dallas and Houston, Texas; and Huntington Beach, California. The events are carefully structured to combine authentic and engaging discussions with other professionals, as well as sessions featuring world class speakers and leading local business people sharing tangible, take-away knowledge based on their experience and success. Additionally, a portion of the proceeds from each event goes to support a local nonprofit organization supporting women and girls.

Our business units, partnering with communications, training and marketing teams, develop and implement product education materials. We engage, educate and support our customers through clear communication utilizing a variety of methods, channels and languages in order to be most effective and meet their distinct needs.

Comerica Works: Supporting our Customers and Communities

Comerica Works, a series of financial education and wellness presentations, led by our Retail Bank Banking Center Managers, is just one of the many touch points that help us deliver on the Comerica Promise in the community. The value-added content is aimed at those who want to learn more about the basics of finance.

Developing new relationships is critical to Comerica's business and the best and most successful relationships begin long before account opening. Accordingly, this program assists with our business development goals through networking, prospecting and community engagement.

Comerica Works: Supporting our Customers and Communities

Comerica colleagues take their role as Trusted Advisor seriously and it is reflected in the feedback we receive from the community. As a trusted financial resource, we help people manage their money effectively and protect themselves from potential risks. The program was launched in July 2018 and reflects our Core Values of Customer Centricity, Collaboration and Involvement.

Comerica Works Seminars include financial education topics such as "Managing Your Credit Score," "Renting vs. Buying a Home" and "Managing Your Cash Flow for Small Businesses."



"Managing Your Cash Flow for Small Businesses" seminar with small business leaders in Austin, Texas

With a thorough understanding of our customers' information needs, we can deliver educational materials that best meet those needs, which helps us build deep and enduring customer relationships. For instance, our Business Bank provides customers with insights into market innovations and risk management, while Comerica's Wealth Management team provides customers with regularly updated analysis, such as a weekly market overviews and more detailed quarterly market outlook insights. We share these and other topics most relevant to our customers through the [Insights](#) page on Comerica.com (see following examples), and by distributing timely and informative content through social media channels, such as LinkedIn and Facebook.

[Click here for more Comerica Insights](#)



Comerica Bank Women's Business Symposium: Detroit - Q&A Roundup

With more people embracing diversity, women have an opportunity to grow and advance in their careers that may not have been quite as accessible in the past.

Comerica Bank
December 17, 2018



You've Reached Your Business Goals: What's Next?

December 14, 2018



Is the Glass Ceiling Broken? - Women's Business Symposium

December 12, 2018



How to Move Beyond Fear and Start Moving Ahead

December 7, 2018



3 Ways to Manage Risk While Building Wealth

December 3, 2018

Financial Inclusion & Financial Literacy

Impact Topic

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 to their money easily, 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, as well as appropriate products to meet the needs of the underbanked.

Moreover, we ensure our products are available in rural areas and where low-income customers live and work. To gather feedback on our products and services we use a number of avenues, seen in the following table to assess how our offerings exceed customer expectations.

| <i>Enhancing Our Products and Services: Gathering Feedback</i> | | |
|--|-------------------|---------------------------|
| Benchmarking | Current Customers | Prospective Customers |
| External Surveys | Focus Groups | Customer Online Community |
| Banking Centers | Call Centers | Social Networks |

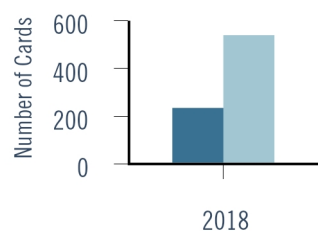
In line with these efforts, Comerica regularly evaluates our physical locations in the communities we serve. Periodically, we relocate banking centers to more convenient and visible locations for our customers. We also refurbish older banking centers to improve environmental performance, improve the efficiency of the delivery of our services and enhance the customer experience. In addition, we are investing in broadening access to our services through our digital offerings. For example, in the fourth quarter of 2018, Comerica's Customer Contact Center launched a multi-phased project to apply next-generation and natural language speech technologies to its Interactive Voice Response (IVR) system. This allows customers to more easily access their account information and make transactions 24 hours a day, 7 days a week. Continued enhancements are being implemented throughout 2019.

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

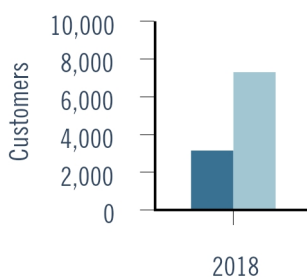
To meet the needs of the underbanked, we have tailored products, such as the Comerica Secured Credit Card, which is an entry-level, cash-secured credit card that helps those who do not qualify for a traditional credit card build credit history. In addition to helping expand our customers' access to credit, we offer the Access Checking account with a flat monthly fee, or no fee with direct deposit. We also offer a Statement Savings account, which has no monthly maintenance fee, encourages good saving habits, and is used by nearly 12,500 low- and moderate-income customers. Finally, we are currently working on improving the customer experience by making it easier for them to open accounts at their convenience through Comerica's online account opening platform.

An overview of the use of our tailored retail banking products within our CRA Assessment areas in Arizona, California, Florida, Michigan and Texas is provided in the figures below.

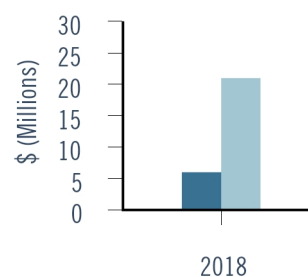
Comerica Secured Credit Cards



Access Checking Customers



Access Checking Balances



■ Low Income
■ Moderate Income

Enhancing Financial Inclusion: Direct Express® Benefits

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

Direct Express®

Key Metrics

- Serves 4.5 million federal benefit recipients
- 373 million payments to recipients since 2008
- Comerica has achieved a 94 percent (or better) cardholder satisfaction rating
- Over 700,000 mobile application users
- One of the most secure prepaid cards in the industry with 100 percent of cardholders using EMV chip and PIN
- Reduced-fee withdrawals completed at Walmart 1.9 million times for over \$1.1 billion in cash since late 2016
- Nearly 1 million cardholders have completed nearly 13 million financial education modules

Helping Millions of Americans Join the Financial Mainstream

Helping the U.S. Treasury provide millions of Americans ready, safe access to their government benefits was the founding mission of the Direct Express® Program. Not only does the innovative prepaid card program deliver benefits more cost effectively and securely, it is an on-ramp to financial inclusion for millions of unbanked Americans - giving recipients the tools they need to participate fully in the economy. Over 73 percent of Direct Express® cardholders do not have a bank account and 46 percent self-report that they have never had a bank account prior to the Direct Express® card. Now, on average, over 4.5 million federal benefit recipients receive their benefits (Social Security, Veterans, Civil Service, Railroad Retirement, etc.) electronically through the Direct Express® card. Since the program's inception in 2008, the federal government has made 373 million payments to benefit recipients through the program.

Direct Express® transactions are covered by regulations that protect federal benefit recipients, and funds on the cards are FDIC insured. Cardholder satisfaction with the Direct Express® program is high - Comerica has achieved a 94 percent (or better) cardholder satisfaction rating every year since the program's inception.

Building a Digital Lifeline

In August of 2015, we introduced the Direct Express® mobile app to give Direct Express® cardholders safe, secure, convenient and portable access to their accounts. In addition to checking their balances and viewing transactions, mobile app users can find the nearest surcharge-free ATM which saves them unnecessary fees. Since launching the app, the number of users has grown to over 700,000 and 98 percent of mobile app users surveyed say that they are satisfied with the app. In 2019, we are adding transaction notifications and other features to protect cardholders and make using their card even more convenient.

Protecting Vulnerable Benefit Recipients from Fraud

In October, 2014, President Obama issued an Executive Order that all federal card programs must present a plan by the end of 2014 to become EMV (Europay, MasterCard, Visa)-compliant (i.e., cards with chip and PIN technology). We began issuing EMV cards to Direct Express® cardholders in 2015 and have reissued 100 percent of Direct Express® portfolio with EMV chip and PIN technology. Because Direct Express® was the first large-scale prepaid card program to offer EMV, we used a comprehensive communications campaign to educate cardholders on the use, security and benefits of chip cards. With 100 percent of our cardholders using EMV chip and PIN, the Direct Express® card protects vulnerable cardholder funds and is one of the most secure prepaid cards in the industry.

Meeting Cardholders Where They Are

Direct Express® has a unique partnership with Walmart that allows Direct Express® cardholders to withdraw the full balance on their card (up to \$1,000) at less than half the cost that Walmart charges other customers for the same service. Since 90 percent of

our cardholders visit a Walmart at least once a year, this has proven to be a very popular service. Since late 2016, Direct Express® cardholders have used this service 1.9 million times to obtain over \$1.1 billion in cash.

Empowering Beneficiaries with Financial Education

Comerica sees education as a critical part of our mission, especially in the case of the Direct Express® program. With 46 percent of our cardholders never using a financial service prior to Direct Express®, financial education is key to a good experience with the program. In order to engage beneficiaries and improve their financial health, Comerica and Mastercard have partnered with PayPerks, an innovative financial learning company that combines short learning modules with a sweepstakes-based rewards program. Close to one million Direct Express® cardholders have engaged with the PayPerks offerings. The course is so popular that as of March 2019, cardholders have taken nearly 13 million financial education modules through the program, most of them via their mobile phone.

Financial Literacy

We are committed to helping our existing and prospective customers make the best possible financial decisions to increase their savings and build wealth. This commitment is reflected in our giving and volunteer priorities, as we partner with nonprofits, schools and community centers to educate youth and underbanked communities. Involvement is a core value at Comerica and it drives our efforts to serve as a trusted resource for financial education, especially for the unbanked and underbanked communities within our key markets.

Comerica Financial Education Brigade

In 2018, Comerica announced the formation of the Comerica Financial Education Brigade (CFEB) to meet the growing need for more financial education in the community. 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.

This team of colleagues participate in Comerica's Money \$ense Program Train-the-Trainers events to learn effective ways of delivering financial education to diverse audiences. Comerica Brigade teams are our “first-responders” when it comes to serving as a financial education resource provider in the community. The Comerica Financial Education Brigade also does more than teach; its members serve on nonprofit boards and provide technical assistance in areas such as legal, human resources and information technology.

"Volunteerism is such an important part of who Comerica is in the community. Our volunteer efforts positively impact our reputation and the ability to meet our business goals. Serving low- and moderate-income communities allows us to 'raise expectations' of what a bank can be to our neighbors, cities and constituents."

- Brian Foley, President Texas Market, Comerica Bank



In addition to colleague involvement, Comerica provides financial support to nonprofit organizations dedicated to developing financially literate communities, including organizations such as Junior Achievement, Operation Hope and EverFi, to teach personal finance basics to people in underbanked areas. In 2018, we reached over 42,500 low- and moderate-income individuals across our markets by sponsoring more than 800 financial literacy events with our nonprofit partners.

Gift of Knowledge Program Expands

The Gift of Knowledge, a part of Comerica's Money \$ense Program, is an initiative that educates students on financial matters as well as provides the opportunity to open their first savings account, access to Comerica personnel and a banking center tour.

In 2018, Comerica expanded the Gift of Knowledge program to reward and empower students in San Antonio. The first 20 students from Ella Austin Community Center to complete the program were awarded \$25 savings accounts, "seeded" through a grant from Comerica. We also made a commitment to reward even more low- and moderate-income students participating in the Comerica Money \$ense programs through Ella Austin's Afterschool and Summer Enrichment Programs.

Ella Austin was the ideal choice to extend the program in the San Antonio market as the community center also houses one of several Comerica Community Resource Centers. Other locations offering the Gift of Knowledge include Dallas and Houston.



Irv Ashford with students from Ella Austin Community Center

"The expansion of the program is part of the bank's strategy to align our education initiatives and create hands-on experiences to foster a mindset of regular saving and asset accumulation habits in low- and moderate-income communities."

-Irv Ashford, Senior Vice President and National Director of Financial Education

Customer Satisfaction

Building successful bonds with our customers is critical to our business and we pride ourselves on our deep and enduring customer relationships. We do this by listening to each customer and taking the time to understand their individual business and personal needs. Our customers' expectations challenge us to meet their financial services requirements while simultaneously satisfying their desires for technology, innovation, efficiency and convenience.

We have responded to customers' financial requirements by designing and delivering a competitive suite of products and services. In particular, we have made numerous enhancements to our products and services as discussed in [Innovation and Technology](#).

Steps to Designing and Delivering Products to Meet Customer Needs

| | |
|------------------------|---|
| Customer Feedback | <ul style="list-style-type: none"> • Focus groups • Online customer community • Quantitative research • Banking Center/Call Center/social feedback channels |
| Competitive Assessment | <ul style="list-style-type: none"> • Analysis of competitive offers and adoption rates |
| Functional Testing | <ul style="list-style-type: none"> • Employee user groups ensure proper functionality prior to customer roll-out |
| Implementation | <ul style="list-style-type: none"> • Staged roll-out • Pilots to optimize functionality when possible • Gather customer feedback and adjust as needed |
| Analysis | <ul style="list-style-type: none"> • Measure results • Provide recommended improvements |

Comerica colleagues work hard to provide exceptional service to every customer. Whenever a servicing need, issue or complaint is raised by a client, colleagues work to address the need or resolve the issue at the first point of contact. If further assistance is needed to resolve a customer's concern, it is escalated to their manager. Following that, Comerica's Corporate Quality Process Department assists when, after escalating to the manager, further assistance is still required.

All complaints received by the Corporate Quality Process Department are tracked and decisioned using a complaint management system. All complaint data is analyzed for any potential trends across business units and customers. This information provides the opportunity to continually improve our customer service and to acquire and retain customers. Complaint data is provided on a regular basis to Comerica's senior management and Enterprise Risk Committee of the Board.

We use customer interviews and surveys to solicit feedback and inform both our current and future product development strategies. Customer survey data provides us insight into overall trends and helps guide our improvement efforts. We also conduct customer satisfaction surveys at the individual banking center level to provide managers with actionable feedback to improve performance. As part of the technology investments we have made within the Customer Contact Center, customers are now offered a survey at the conclusion of every call, to assess the effectiveness of our services and provide any other feedback. Moreover, to focus on the customer experience even before customers have the chance to provide feedback, our managers from across departments adopt the customers' perspective to review products under development for industry benchmarking, the product's likely impacts and expected customer outcomes from using the products.

ESG-Related Lending & Investment

Impact Topic

ESG-related business activities refer to the ways that a business enhances society through its products, people and practices. A common alignment of ESG-related business activities can be found in frameworks such as the United Nations Sustainable Development Goals. 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.

In this year's report, we've broadened the focus of this Impact Topic from Green Lending to ESG-Related Lending and Investment. This update accounts for the increasing stakeholder interest in ESG issues and better describes how we work with our customers in these areas as they increasingly look for ways to align their personal, business and investment interests with their values.

You can learn more about how Comerica supports ESG-Related Lending and Investment in the following areas of our report:

- The [Diversity & Inclusion](#) section discusses our Market Segmentation Initiative teams.
- The [Environment](#) section discusses Environmentally Beneficial Lending.
- The [Community](#) section discusses community investment and development activities.

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, executives 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 affect all of our stakeholders.



"Integrity and accountability are the cornerstones of solid corporate governance in the banking industry. Comerica's commitment to building trust is a major pillar to establishing the future success of the organization."

- Richard G. Lindner, Comerica Incorporated Board of Directors

| | |
|------------------------|--|
| 2018 PROGRESS | Ongoing enhancements to the quality and comprehensiveness of our enterprise risk and corporate governance programs |
| | Enhancements to our training programs around responsible business issues, including our codes of conduct and measures to counter corruption |
| | Redesigned compensation program to better align senior officer compensation with long-term performance in line with stakeholder feedback |
| 2018 CHALLENGES | Varying approaches for defining, categorizing, and reporting complaints which make peer and year-over-year comparisons difficult |
| | Striking an appropriate balance and utilizing the best channels for providing financial and non-financial information to serve the diverse needs of stakeholders |
| | Maintaining our reputation in an increasingly fast-paced and digital world |

The following subsections of this report provide examples of our core value of Integrity:

- Strong [Corporate Governance](#) structure and Board oversight, which guide our efforts;
- [Reputation](#) which describes the collected perception of our company based on our conduct and business practices;
- A holistic approach to [Business Risk Management](#), which helps us to focus on long-term sustainable performance;
- Our work on [Anti-Corruption, Ethics and Countering Bribery](#), which creates accountability at all levels of the organization; and

- [Public Policy and Government Relations](#) efforts, which describe how we comply with and guide development of regulation in our industry to promote good business practices and customer stewardship.

Corporate Governance

Strong corporate governance is the foundation of the trust that customers and other stakeholders place in Comerica. We are committed to strong governance at every level of our company. Our Board, specifically its Governance, Compensation and Nominating Committee, oversees corporate governance. [Our Code of Business Conduct and Ethics for Employees](#) outlines our commitment to sound corporate governance practices and guides colleague behavior. We also have codes of ethics for both Comerica's Board of Directors and its Senior Financial Officers. For additional information on Comerica's governance philosophy, standards and expectations, see our [Corporate Governance Guidelines](#).

Examples of our Board's Commitment to Good Corporate Governance

| | |
|---|--|
| <ul style="list-style-type: none"> • Annual election of directors | <ul style="list-style-type: none"> • Regularly scheduled executive sessions of non-management directors |
| <ul style="list-style-type: none"> • Regular assessment of Board composition and potential enhancements | <ul style="list-style-type: none"> • Majority voting for directors |
| <ul style="list-style-type: none"> • Annual self-evaluation by the Board and its committees | <ul style="list-style-type: none"> • 10 out of 12 directors are independent |
| <ul style="list-style-type: none"> • Independent Audit Committee; Enterprise Risk Committee; Governance, Compensation and Nominating Committee; and Qualified Legal Compliance Committee | <ul style="list-style-type: none"> • Robust responsibilities and duties assigned to independent Facilitating Director |

Comerica's Board of Directors is responsible for the oversight of Comerica's management team, which is under the direction of the Chief Executive Officer (CEO). Comerica's Sustainability Director provides annual updates to the Board's Enterprise Risk Committee, which reviews our value creation approach to corporate sustainability including areas of progress, challenges and future initiatives.

We have a strong and diverse Board with a variety of industry, financial and leadership backgrounds. Our Board appointed another independent director in 2017, Barbara R. Smith, who is the chairman, president and CEO of Commercial Metals Company. Additionally, Curtis Farmer, President and CEO of Comerica Incorporated and Comerica Bank, was appointed to the board in 2018.

Read more about our corporate governance structure at [Comerica.com](#) and in our [2019 proxy filing](#).

Transparency

Impact Topic

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 most significant ESG topics for our business. We are committed to both transparent disclosure of information and the implementation and maintenance of systems to obtain and verify information that stakeholders desire.

Comerica provides extensive information on [Comerica.com](#), including investor presentations, annual and quarterly reports, our proxy statement and [news releases](#). We also comply with numerous disclosure obligations, such as those found in our [SEC filings](#) and other regulatory filings. Our commitment to publishing biennial sustainability reports using the GRI Standards framework fosters ESG transparency; this includes identifying the most significant issues, successes and challenges for our business and reporting progress regularly to our stakeholders.

| <i>Our Transparency Impacts</i> | | <i>Where to Find in Comerica's Public Reports</i> |
|---------------------------------|---|---|
| Financial Transparency | Allows investors to evaluate our performance through consistent, detailed reporting of relevant metrics and analysis of the key drivers of our business | This Corporate Responsibility Report Investor Relations section of Comerica.com for Annual Report and other SEC filings |
| Environmental Transparency | Provides insight into the progress and manner in which we are meeting our commitments to reach certain goals and targets; making goals public provides additional motivation to be successful | This Corporate Responsibility Report Sustainability page on Comerica.com , including CDP Climate Change Response |
| Social Transparency | Demonstrates the importance placed on diversity and inclusion; reflects our responsiveness to stakeholder inquiries; enhances relationships with diverse employees and customers | This Corporate Responsibility Report Most recent Diversity & Inclusion Report Corporate Responsibility page on Comerica.com |
| Governance Transparency | Instills stakeholder confidence that sound governance practices are followed; strengthens business performance | This Corporate Responsibility Report Corporate Governance section of Comerica.com |

Executive Compensation

Outstanding leadership is vital in our highly competitive industry and is necessary to maintain strong governance practices. At Comerica, we use our executive compensation programs to align the interests of executive officers with those of our shareholders. Our programs support transparency for participants and shareholders and are designed to attract, retain and motivate the company's leaders to sustain our competitive advantage in the financial sector, and to provide a framework that encourages strong financial results and positive shareholder returns over the long term.

Compensation Program Objectives and Key Highlights for 2018

| | |
|----------------|--|
| Objectives | <ul style="list-style-type: none"> Align interest of executives with interest of shareholders Demonstrate a strong pay for performance linkage Reflect good governance and ensure our compensation programs do not incent excessive risk Attract, retain and motivate leadership to sustain our competitive advantage |
| Key Highlights | <ul style="list-style-type: none"> Eliminated the long-term cash program (LTEI), which measured performance relative to peers. This change better aligns program design with other financial institutions and feedback received from regulators and investors. |
| | <ul style="list-style-type: none"> Revised stock program to include all senior officers, regardless of pay grade, in the Senior Executive Long-Term Performance Program, a three-year, forward-looking performance plan. This is the first time that all senior officers have equity awards subject to performance goals. |
| | <ul style="list-style-type: none"> Adopted a new equity compensation plan, approved by shareholders in April 2018, that includes key best practices, such as: <ul style="list-style-type: none"> Double-trigger vesting if awards are assumed by a buyer, Prohibition on repricing of stock options and stock appreciation rights, Minimum vesting requirement for at least 95 percent of plan awards, No payout of dividends on unvested equity, and Individual share limits |

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

Approximately 98 percent of shareholders voted in support of our 2017 and 2018 "Say On Pay" proposals. We considered this overwhelming shareholder support in reviewing our executive compensation programs for 2018 and believe that this vote reinforces our 2018 compensation program changes. The Governance, Compensation and Nominating Committee intends to keep the existing program structure in place for 2019, but will continue to consider shareholder feedback, as well as evolving executive compensation practices and regulatory requirements, in the future when designing executive compensation programs.

Reputation

Impact Topic

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. We must earn that trust every day.

Given our mission of being the highest performing, most respected and most desired bank in the markets we serve, we understand we can't be successful without our reputation. Our reputation is impacted by numerous internal and external factors, ranging from customer service to community development or from corporate governance to our approach to diversity. In this way, reputation is embodied in virtually all of our Impact Topics. 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.

Business Risk Management

Impact Topic

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

Every individual at Comerica plays a role in managing risk to help achieve our strategic goals and deliver on the [Comerica Promise](#). Comerica's Enterprise Risk Division (ERD) provides centralized oversight, challenge and guidance to business unit risk owners across the organization to help strengthen their risk management practices. Our team of risk experts provides consistent processes for how our business units identify, measure and manage existing and emerging risks. They ensure alignment of risk practices across Comerica. The Chief Risk Officer, who manages the ERD, chairs the Enterprise-Wide Risk Management Committee and reports to both the CEO and to the Enterprise Risk Committee of the Board (ERC). Our ERD continually reviews Comerica's risk policies and risk management initiatives.

Comerica's risk management practices are guided by the Enterprise Risk Management Framework, which is approved annually by the ERC. 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. Comerica's Risk Appetite Statement is an important component of the framework, as it identifies the level of risk the organization is willing to accept.

Examples of risks we manage through our Enterprise Risk Management Framework are:

| <i>Example Risk Types</i> | <i>Description</i> | <i>Management Approach</i> |
|-----------------------------|---|--|
| Credit Risk | Managing credit risk is a critical aspect of the relationship with our customers to whom we extend credit and provide other financial products. | <ul style="list-style-type: none"> Comerica's Strategic Credit Committee, chaired by our Chief Credit Officer, has ultimate oversight of credit risk, supported by multiple subcommittees with various approval authorities, depending on the type of transaction, level of financial commitment, credit risk rating and customer type. The Strategic Credit Committee considers portfolio risk analysis, our risk appetite and the corporate strategy to ensure appropriate policies are in place to evaluate and mitigate potential losses. In addition to standard policies, there are also policies specific to select industries, collateral types or other specialties. Credit colleagues undergo formal training in credit analysis and underwriting. In doing business, we follow a broad collection of credit policies and guidelines that limit risk and provide portfolio diversification. |
| Economic Environment Risk | Comerica is directly affected by the conditions of the geographic and business markets in which we operate, the state of the U.S. economy, including fiscal and monetary policy, the financial regulatory environment, global conditions which influence interest rates and exchange rates, and by other factors which impact our customers and our own business lines (see Economic Impacts). | <ul style="list-style-type: none"> While we have little ability to influence the broader economic environment on our own, we can and do actively manage our company's associated risks. The ERD uses ongoing stress testing and sensitivity testing to understand how changes in the economic environment may impact our company. Our close relationships with customers, including a deep understanding of their business, coupled with Comerica's strong leadership and conservative approach to business, position us well to weather difficult economic environments. |
| Regulatory Risk/ Compliance | Managing regulatory risk and complying with associated federal and state regulations is central to our commitment to operate as a responsible business, and critical to maintaining our reputation. | <ul style="list-style-type: none"> We help ensure compliance across our business activities by requiring our colleagues to complete in-depth training programs and to follow our Code of Business Conduct and Ethics for Employees. Managers use monitoring tools to capture potential cases of violation or non-compliance by employees, which are immediately referred for investigation and resolution. |
| Reputation Risk | Our business is based on the trust of our customers, communities, and entire value chain, which makes managing reputational risk extremely important. | <ul style="list-style-type: none"> Our leadership team actively oversees potential risks to our reputation, and our rigorous monitoring processes guard against incidents related to compliance, operational risk, and social and environmental risks. |

| <i>Example Risk Types</i> | <i>Description</i> | <i>Management Approach</i> |
|---------------------------|--|--|
| Environmental Risk | Environmental risk is an increasingly relevant and high profile issue. For Comerica, such risk includes both the environmental impact associated with our own operations and those of our customers. | <ul style="list-style-type: none"> Comerica's Environmental Risk Management (ERM) Group, within our ERD, manages risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate and minimize potential environmental risks associated with loans secured by real estate. Read more about this in Environmental Risk Management within the Environment section. Risks associated with the impacts of our operations are managed through the Corporate Sustainability Office in close partnership with Corporate Real Estate, Procurement and other internal business units. Read more about this in Managing Environmental Impacts of our Operations. This includes climate change risks such as those framed by the Task Force on Climate-related Financial Disclosures (TCFD). |

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 [2018 Annual Report](#).

Business Continuity

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

Responsible Marketing and Sales

Fulfilling the [Comerica Promise](#) includes presenting our products to consumers honestly. We review our marketing communications before release to ensure compliance with relevant regulations and laws, including the Equal Credit Opportunity Act; the Truth in Lending Act; the Truth in Savings Act; and Unfair, Deceptive and Abusive Acts and Practices. The Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC) also regulate certain types of marketing materials and we carefully review such material through our legal, risk and compliance processes. Comerica monitors compliance with marketing laws and regulations through regulatory agency examination performance, internal audits and internal testing. Our Quality Process Department also reviews relevant customer complaints to identify potential issues, as described in the [Customer Satisfaction](#) section.

Per U.S. regulatory requirements for customer contacts and interactions, we implement internal policies and procedures, including clearly stated interest rates and other terms and conditions. We require that relevant colleagues complete comprehensive, annual fair lending and anti-discrimination training, with 99.9 percent of applicable employees doing so in 2018.

We are not aware of any incidents of non-compliance related to fair lending, anti-discriminatory regulations, anti-competitive behavior or anti-trust or monopoly practices occurring in 2018 that would have a material adverse effect on our operations or ability to perform the services we offer.

Anti-Corruption, Ethics & Countering Bribery

Impact Topic

Real or perceived incidences of corruption or lapses in ethics can decrease stakeholder confidence in a financial institution. 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.

Our Codes of Conduct

A key tool for instilling an ethical culture at Comerica, and ensuring our compliance with related laws and regulations, is our [Code of Business Conduct and Ethics for Employees](#). The Code supports the [Comerica Promise](#) and provides guidance on issues including ethical business practices, fair dealing, maintaining professional relationships, avoiding conflicts of interest, and reporting illegal or unethical behavior.

The honesty, integrity and sound judgment of the CEO and senior financial officers is fundamental to our reputation and success. Accordingly, we also have a [Senior Financial Officer Code of Ethics](#). To assist in fostering a culture of openness and accountability, Comerica Board members are subject to our [Code of Business Conduct and Ethics for Members of the Board of Directors](#). Our contingent workers also complete training, which includes code of conduct information. In 2018, Comerica enhanced our Code of Business Conduct and Ethics training and expanded our Sexual Harassment training to all colleagues.

We use a variety of communication channels, including training and our intranet site, to remind colleagues of the importance of reporting conduct that may violate the law or our employee code of conduct. Also, we have an internal Problem Resolution Procedure designed to ensure that employees have the opportunity to formally address their concerns and present alternative solutions regarding their conditions of employment. In 2018, 35 complaints were recorded via the hotline, all of which were resolved. There were no labor practice grievances filed through formal grievance mechanisms in 2018.

Countering Corruption

Money laundering, bribery and corruption also 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. 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).

Our rigorous [Anti Money Laundering \(AML\) Compliance program](#) deploys systems to monitor customer and business unit risks, and implements additional controls and/or quality assurance reviews when specific risks are identified. Our Anti-corruption and AML policies are periodically reviewed and updated to ensure they are commensurate with any changes to our risk appetite. Anti-corruption and AML policies are approved by our Board of Directors and are independently tested on a yearly basis by Internal Audit and outside regulatory agencies.

In 2018, we strengthened our program by fully implementing the collection of required Beneficial Ownership information at account opening. We also continue to follow and manage changing regulatory expectations as it relates to the marijuana and cannabidiol (CBD) industries.

Fraud Resolution

Comerica investigated 227 reported internal incidents of alleged corrupt behavior in 2018. Of these, 125 were categorized as unfounded, or inconclusive, including cases that were determined as no fraud or no dishonest act, or where the employee voluntarily or previously resigned. In 102 cases, allegations were substantiated and/or the employee admitted involvement. In those cases, Comerica took corrective action, including terminating employees for violating bank policy where appropriate. We managed each case on an individual basis; single incidents were counted multiple times when several people were involved. During 2018, there were zero cases involving contracts that were not renewed due to corrupt vendors and no legal cases were brought against Comerica or its employees for corruption.

Employee Training

Comerica colleagues complete an annual, mandatory online training module on the Code of Business Conduct and Ethics for Employees, which emphasizes personal accountability in complying with its provisions. In 2018, 99.9 percent of active employees completed the training. Colleagues, in most cases, are required to complete additional annual regulatory and other ethics or human rights-related training. Compulsory training programs are also in place for Information Privacy and Protection, Anti-Money Laundering and Diversity as well as for a one-time Sustainability training course.

By the Numbers: Mandatory Employee Training in 2018

| <i>Compliance, Diversity, and Sustainability Training Topics</i> | <i>Total Hours</i> | <i>Percent of Relevant Employees Who Completed Required Training in 2018</i> |
|--|--------------------|--|
| Anti-Money Laundering | 7,122 | 100% |
| Comerica Code of Business Conduct and Ethics for Employees | 4,554 | 99.9% |
| Fair Lending Anti-Discrimination | 4,843 | 99.9% |
| Information Privacy and Protection | 9,821 | 99.9% |
| Community Reinvestment Act | 4,076 | 99.9% |
| Financial Abuse of Elderly and Vulnerable Adults | 2,389 | 99.9% |
| Workplace Harassment | 508 | 99.3% |
| Diversity | 1,183 | 99.2% |
| Sustainability | 242 | 100.0% |

Human Rights

Beyond our own operations, we look to promote human rights and progress with our stakeholders. We work with customers, suppliers and communities to encourage equal opportunity, fair lending, privacy protection, and economic and social development. Our standard agreement with suppliers and contractors requires that they act in compliance with all applicable laws, including those on equal employment opportunity, employment practices, immigration and data protection, and abide by Comerica's non-discrimination and diversity practices. As Comerica primarily does business in the United States, we have no significant presence or investment in countries where lack of human rights protection is a known problem.

Public Policy & Government Relations

Impact Topic

Comerica closely monitors and engages in the development of public policies that directly affect our business and industry. Due to the potential magnitude of regulatory impact, it is prudent to stay actively involved in the public policy process.

Our advocacy efforts, led by our Director of Government Relations, are focused at the federal level and in our key markets: Texas, Arizona, California, Florida and Michigan. Our executives meet with elected officials and engage with national and state banking industry trade associations. We work with these associations to advocate on behalf of the regional banking industry and target legislation or regulation that impacts the products and services we offer.

Major Industry Associations Engaged

- | | | |
|--------------------------------|----------------------------------|----------------------------------|
| • American Bankers Association | • The Clearing House Association | • Bank Policy Institute |
| • Consumer Bankers Association | • Texas Bankers Association | • California Bankers Association |
| • Michigan Bankers Association | • Arizona Bankers Association | • Florida Bankers Association |

Current public policy challenges facing Comerica include compliance with and capital implications of new loan loss accounting standards (Current Expected Credit Loss or CECL model) and remaining engaged in the debate over such ongoing legislative issues as consumer privacy, cybersecurity, Bank Secrecy Act/Anti-Money Laundering (BSA/AML) reform and Community Reinvestment Act (CRA) modernization.

With respect to public policy for environmental and climate change issues, we annually review all organizations where Comerica colleagues occupy board-level roles. We hold follow-up discussions with relevant board member colleagues whose organization's policies and positions conflict with Comerica's corporate climate and sustainability strategy. In 2018, we did not identify any such conflicts.

Political Contributions

One way that Comerica participates in the political process is through contributions made by its political action committee (PAC). The 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 and approved by a separate PAC Board comprised of senior executives from across the company.

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

During the 2017-2018 election cycle, the Comerica PAC contributed \$624,000 to political candidates and committees. For Comerica PAC contributions between November 1, 2017, and October 31, 2018, see the [Political Activities and Contributions](#) section of Comerica.com, which is updated annually. Comerica does not make soft-money or in-kind political contributions, or use corporate funds to make direct political contributions to candidates for public office or groups organized to influence political campaigns.

COLLEAGUES

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

The Colleague Promise

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.

| | |
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| 2018 PROGRESS | Successfully completed initiatives that improved our efficiency, compliance and productivity, including executing several Gear Up Initiatives, implementing Converge, nCino and time-keeping systems, providing a human resources data analytics tool to managers, and providing technology on-boarding for new hires. |
| | Redesigned corporate and business unit incentive compensation governance and programs to align with business and risk objectives and to promote colleague attraction and retention. |
| | Focused on employee development, retention and engagement, including the launch of Comerica University to strengthen colleague skill sets. Launched the second installment of the Management Essentials Certificate Series to enhance managing and leading skills of Comerica managers. |
| | Launched the initial employee engagement initiative to enhance retail banking center and human resources colleagues' levels of engagement, energy and enablement. |
| 2018 CHALLENGES | Establishing and nurturing the internal pipelines and external networks that will yield qualified candidates. |
| | Continuing to drive and support initiatives that improve our efficiency, compliance and productivity. |
| | Investing in learning programs and tools to support, replace or improve existing programs due to new or changed business models such as the e2e Credit Redesign project (e.g. Credit Training Program), customer relationship management, sales coaching, Banking Center Transformation and Enterprise Technology up-skilling initiative. |

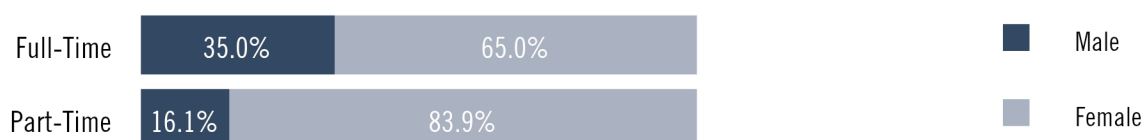
Talent Attraction, Development & Retention

Impact Topic

Comerica's Human Resource team is committed to partnering with the entire organization to help drive growth and shareholder value. The division is comprised of specialty areas overseeing talent attraction, learning and development, operations, total rewards, and human resources consulting. Development, attraction and retention are a focus for our Board of Directors and its Governance, Compensation and Nominating Committee. Our Human Resource leaders regularly review our programs with the Board and demonstrate that our organization remains committed to fostering a collaborative and desirable workplace.

At year-end 2018, we had 8,051 total employees (7,573 full-time and 478 part-time). There were 7,865 employees on a full-time equivalent (FTE) basis. We had 1,569 temporary contract (contingent) workers (FTE basis) operating within our buildings and remotely in 2018, which represents 16.6 percent of our total workforce (employees plus contingent workers working on Comerica activities). Of that number, 83 percent work in our technology department maintaining hardware and supporting software. A breakdown of contingent workers by gender was not available. For more details on Comerica's diversity numbers, go to [Diversity and Inclusion](#).

Permanent Employees by Labor Type and Gender



Our colleagues are critical to our business success, and the success and well-being of our colleagues is a priority. Our recruitment, learning and development practices ensure that we meet the needs of high-performing colleagues through the following focus areas:

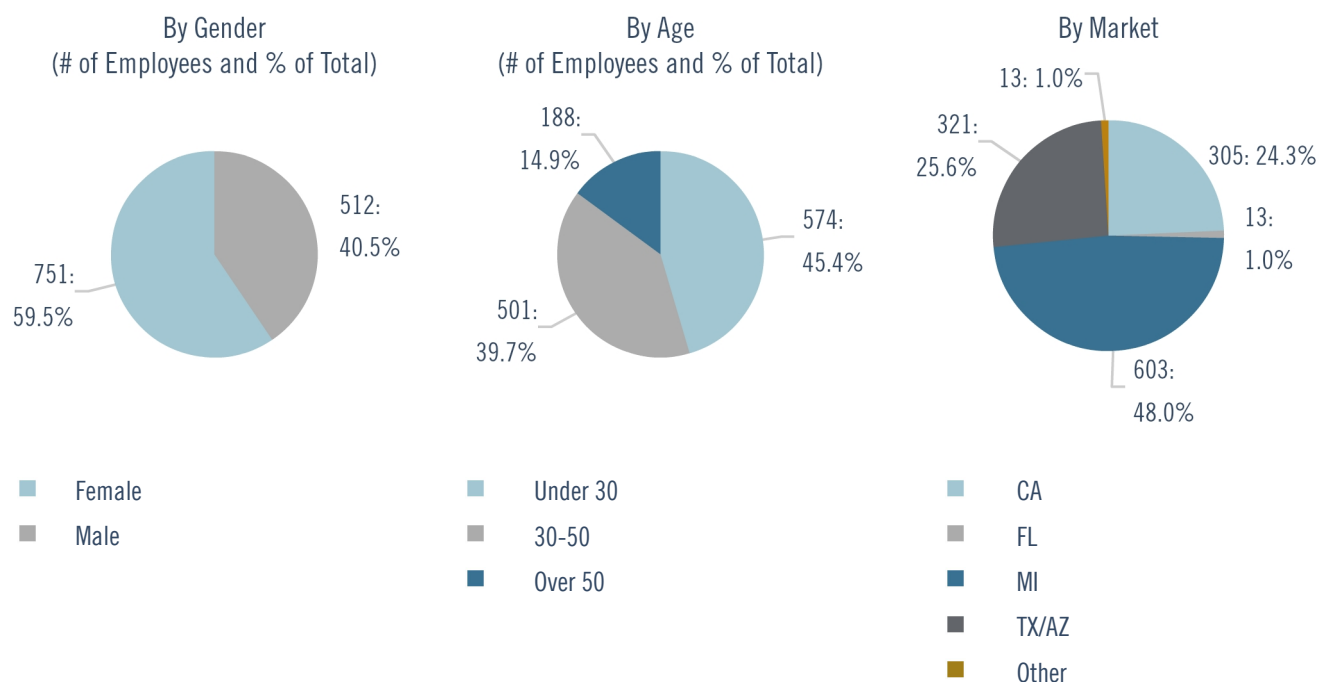
- Recruit and hire the best candidates with the appropriate skill sets and values.
- Pay appropriate and competitive wages, with benefits that fit our demographics.
- Provide top quality training and development for all colleagues, from compliance to skills training.
- Support managers and employees through counseling and facilitate talent management reviews.

Attracting New Colleagues

Our business depends on attracting and retaining diverse and bright talent. 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. Our multi-channel sourcing model drives our talent acquisition strategy to:

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

2018 New Hires



Developing Colleagues

Learning

Most of our employee development takes place outside of formal learning settings. This is the best and most effective way to learn. Coaching and mentoring account for roughly 70 percent of development, learning through exposure accounts for 20 percent, and classroom activities account for the remaining 10 percent. Colleagues are encouraged to develop their competencies by pursuing individual development plans (IDP). IDPs are required for all high potential employees and strongly encouraged at the vice president level or above. Our talent management software contains over 80 pre-populated development plan templates across key competencies. Colleagues' Core Value competencies are evaluated annually as part of the performance management process. Managers are also evaluated on their managing and leading skills sets. Senior management regularly reviews the results of our talent management approach based on demographic, career and diversity targets.

Comerica's Key 2018 Development Priorities

Developing Talent Early is Smart

Comerica continued the Emerging Leader Development Program (implemented in 2017), which targets colleagues who have been identified to have the potential for future vice president positions. 47 colleagues completed the inaugural program. We also launched Comerica University to help develop and strengthen skill sets as colleagues grow in new or different roles. This required developing learning maps for key roles so that our foundational strategies were skill-supported.

Comerica's Key 2018 Development Priorities

| | |
|---------------------------|---|
| Managers are Essential | Comerica believes effective managers drive results, strengthen culture and engage colleagues. Comerica provides the Management Essentials Certificate Series, a five certificate program that strengthens managing and leading skills of managers as they address employee, project, change and interpersonal situations. In 2018, Comerica launched the second certificate which focused on people. 1,043 managers have completed at least the first certificate leading to higher average scores in the competency areas of managing and leading. |
| Re-Skilling Opportunities | An initiative designed to re-skill and prepare our Technology colleagues for Comerica's digital transformation. The program resulted in 545 (75 percent) Technology colleagues completing two or more ComTech college courses and 673 (92 percent) colleagues completing one course. |
| Change for the Better | In 2018, Comerica launched a new organizational change management (OCM) function to support managers and colleagues. The OCM function is responsible for helping managers and colleagues successfully prepare for and work through change. OCM guides and minimizes the impact of business processes, technologies, organizational structures and cultural changes on colleagues. As Comerica continues to raise the expectations of what a bank can be, we expect change and the resistance and angst it brings. The OCM team fosters adoption and marshals support and resources to facilitate smooth transitions, for colleagues and the organization. |

In 2018, the average hours of training per employee (including mandatory training) was 24.2 hours. 6,227 skills-based courses were offered to Comerica employees (over double the amount in 2016), and 77 percent of employees took advantage of non-mandatory, non-compliance training to increase their knowledge and strengthen their skill sets. All contingent workers who access our systems and work on behalf of Comerica are provided applicable and required regulatory and compliance training.

Recognizing the Value of Ongoing Personal Development

Comerica invests in its colleagues by offering a wide range of professional, interpersonal and technical learning opportunities. Comerica colleagues completed approximately 178,000 hours of learning and development in 2018, with a total market value of \$28.4 million. Market values for the training courses were obtained through a trusted third-party benchmark exercise and aligned to the type and topic of each opportunity.

Leadership Development Program

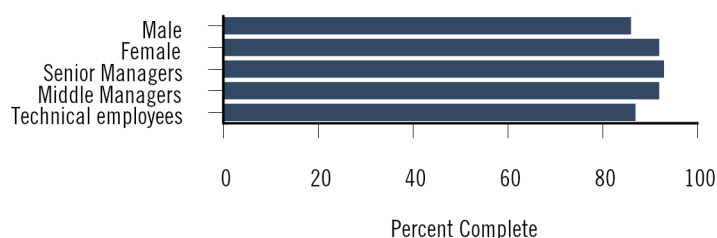
Comerica conducts its Leadership Development Program (LDP) to develop future leadership talent. The experiential program uses a cohort approach, including working on collaborative projects to address a few of the organization's key strategic challenges. LDP brings together middle-management colleague participants and senior leaders for skills development, mentoring and networking. In 2018, 26 colleagues completed LDP. Colleagues participated in 360-degree assessments, executive presence skill training, presentation training and strategic project work to learn how to marshal and move resources throughout the bank. The colleagues researched and provided recommendations to address strategic challenges at Comerica, culminating in final recommendations to Comerica executives and senior leaders. Also in 2018, LDP alumni were provided with an assessment opportunity pertaining to their cognitive, engagement and collaboration levels as part of their continuing education and development efforts.



Performance Reviews

Comerica strives for a robust and efficient performance management process that incorporates system tools, and candid and constructive discussions between managers and colleagues to achieve both the company's objectives and our colleagues' goals. Comerica managers hold at least annual performance review discussions with their employees. Our managers are assessed against a Managing & Leading competency (skill) model during their performance review.

Percent of Completed Performance Reviews by Gender and Employee Type



Comerica aims to ensure colleagues are recognized for their contributions and promote an atmosphere of collegiality. We use an online recognition tool (CoStar) for managers, peers and colleagues to send e-cards, as well as tangible and cash awards to individuals who excel at demonstrating Comerica's Core Values in their work. In 2018, 2,518 CoStar awards were sent to colleagues totaling over \$425,000 and nearly 26,000 colleague-to-colleague thank you e-cards were sent to recognize colleagues on a job well done.

Retaining Colleagues

To assist managers in retaining top employees, an Employee Retention Toolkit was developed. The toolkit helps managers become proactive in assessing retention risks and impacts. It also provides guides to help retain employees, and key discussion points highlighting Comerica's strengths as an employer.

Exiting employees are provided a link to an employee exit survey which gives us an opportunity to better understand why individuals leave Comerica, to follow-up if any concerns are raised and, if appropriate, develop targeted programs to address any recurring issues. Quarterly reports are produced and shared with the human resources directors. This data is also disseminated to business unit management. The fourth quarter 2018 report, our first full quarter of data, did not identify any unexpected trends or concerns. Each exit survey is reviewed, and any issues investigated as appropriate.

Total Rewards: Recognizing the Full Value of Working at Comerica

We provide a wide range of programs that are designed to recognize, reward and develop our colleagues throughout their career. Our Total Rewards personalized online statement goes beyond a colleague's salary and shows the value of the total compensation and benefits provided by Comerica (see table below). It provides a snapshot of Comerica programs and highlights the value of Comerica's investment in each colleague.

On an annual basis, Comerica provides a merit pay opportunity to eligible colleagues. Merit dollars are allocated based on several factors, which include performance, experience, time in position, contribution and internal parity. Individual increases are determined by managers with input from Human Resources to provide higher rewards to high-performing individuals based on the factors noted above.

To support the full spectrum of employee needs, we offer the following benefits:

Full-Time Employee Benefits

| | | |
|-----------------------------------|---|------------------------------------|
| Medical ¹ | Employee Assistance Programs ¹ | Health Accounts ^{1,2} |
| Dental ¹ | Short-term Disability/Long-term Disability | Financial Product Discounts |
| Vision ¹ | Life Insurance, AD&D, and Dependent Life ¹ | Paid Time Off Program ¹ |
| Accident ^{1,3} | 401(k) Plan with Employer Match ¹ | Paid Holidays ¹ |
| Critical Illness ^{1,3} | Retirement Income Account Plan ¹ | Group Legal |
| Hospital Indemnity ^{1,3} | Employee Stock Purchase Plan ¹ | Tuition Assistance Program (TAP) |

¹ Benefits also offered to part-time employees scheduled to work at least 20 hours per week.

² Including Health and Dependent Care Flexible Spending Accounts, Commuter Benefits, and Health Savings Accounts.

³ Introduced in 2019.

Comerica provides a number of other programs to encourage employee well-being:

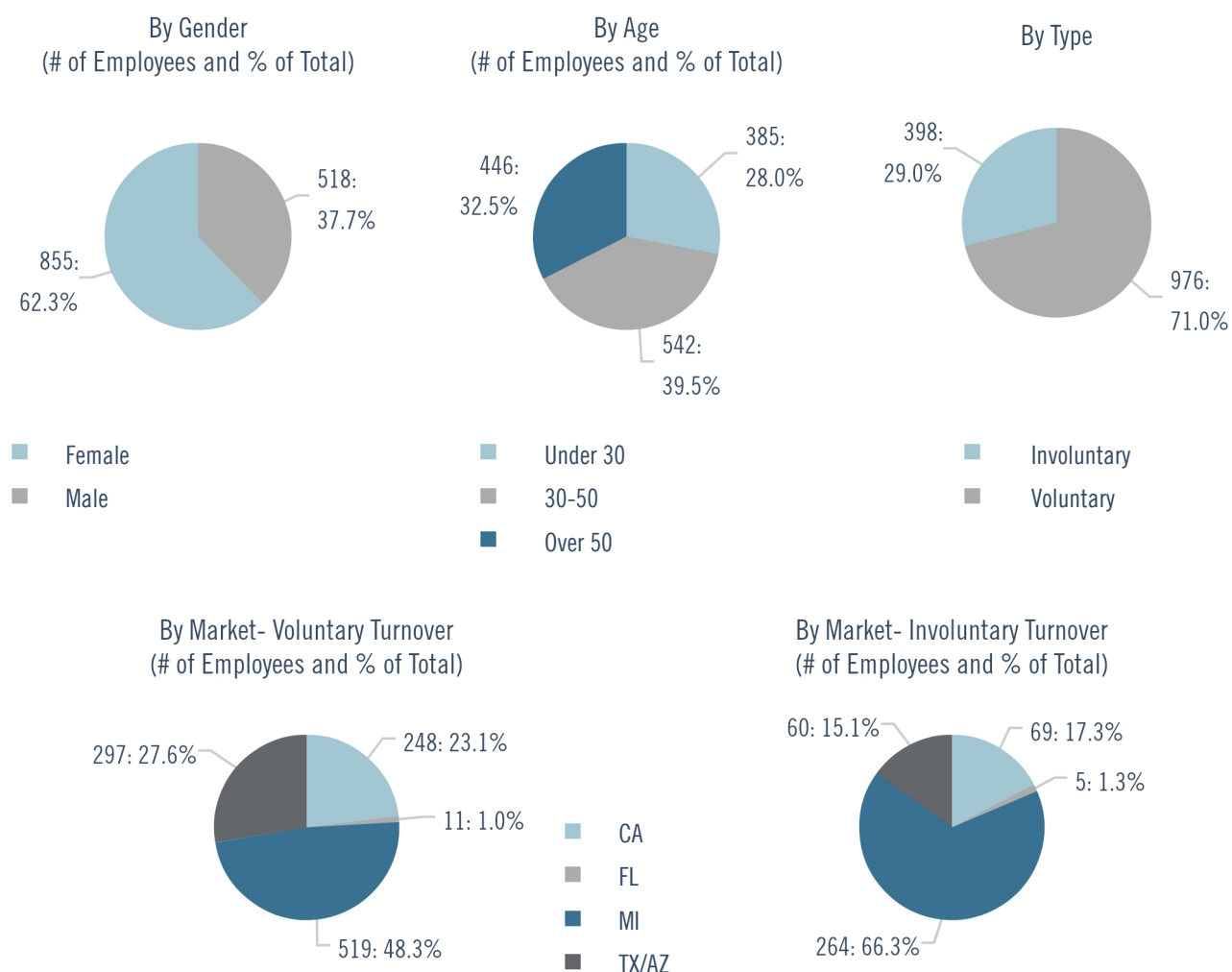
- Flexible Work Arrangements can help employees better align performance and work-life balance based on specific needs.
- Comerica's Health and Safety Policy provides colleagues and managers with guidelines for maintaining a healthy work environment. It complies with Occupational Safety and Health Act requirements.
- The Employee Assistance Program provides resources to support colleagues in a vast array of areas, including weight management, tobacco cessation, as well as health and wellness coaching. Managers and human resources consultants work with the program's external service provider to offer training sessions and webinars on workplace and personal health and safety. Comerica colleagues used the Employee Assistance Program 3,621 times in 2018.
- Tuition assistance to full-time employees. Tuition assistance was provided to 131 colleagues in 2018, representing over \$450,000.

Employee Turnover

Comerica's focus on attracting, developing and retaining colleagues has resulted in 2018 turnover rates that continue to be less than industry averages.

- Comerica's overall turnover rate was 17 percent as compared to a median of 20.1 percent in the most recent Bank Administration Institute (BAI) benchmark study.
- Comerica's voluntary turnover rates declined to 12.1 percent, less than the 2017 rate of 13.2 percent. Comerica's voluntary turnover rate was 4 percentage points less than the 2017 BAI benchmark median of 16.2 percent. Voluntary turnover rates have decreased in all markets except California where there was only a slight increase of 0.2 percent.
- The involuntary termination rate (excluding position eliminations) has remained relatively flat over the last three years and in 2018 was 2.6 percent, as compared to the total involuntary termination rate of 4.9 percent.

2018 Employee Turnover



Comerica offers career transition assistance to employees affected by job loss due to workforce reductions, including employment resources and career consultation at all levels. In addition, our Employee Assistance Program offers free and confidential support to colleagues and their families who are experiencing personal or professional difficulties.

Employee Engagement

Impact Topic

Comerica operates in a dynamic and competitive industry, which makes engagement of colleagues critical to success. We find engaged employees to be more loyal and productive. Open lines of communication between colleagues and leaders are an integral part of our 170-year 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.

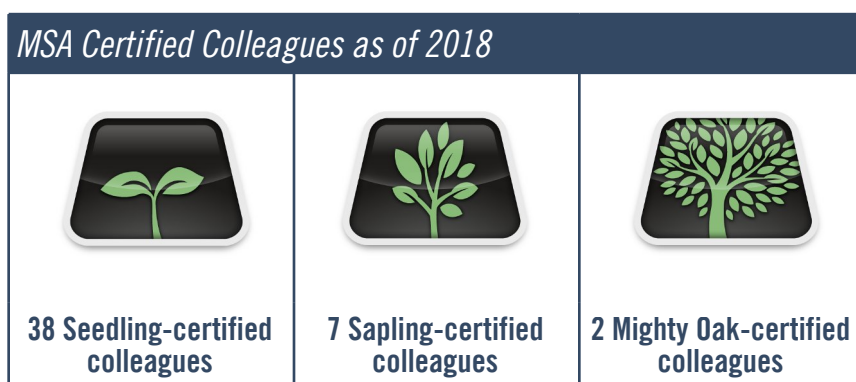
In 2018, Comerica launched an employee engagement initiative targeting Retail Banking Center and human resources colleagues. The feedback revealed strong colleague support of Comerica's Core Values.

Comerica also engages employees on the company's diversity, sustainability, volunteerism and philanthropy efforts. For more details, read below for our sustainability-related engagement, go to the [Diversity & Inclusion](#) section for diversity engagement or to the [Community](#) section for philanthropic, volunteerism, and other community-related engagement.

Engaging Colleagues on Environmental Sustainability

From making green loans to recycling office supplies, we engage colleagues by harnessing their enthusiasm and commitment to drive our environmental sustainability efforts. We engage and educate 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 2018 new hires completing the course.

A cornerstone of our engagement on sustainability is Comerica's Master of Sustainability Awareness (MSA) program, which was made available to all colleagues in 2017. This internal certification program is built on four pillars: Education, Communication, Engagement and Advocacy. MSA uses the metaphor of a growing tree. Our colleagues start at the Seedling level, where the focus is education, then progress to the Sapling level, where the focus lies on balancing the four dimensions, and finish at the Mighty Oak level, which is focused on advocacy — the 'doing' part of sustainability. MSA is designed to move Comerica colleagues from learning about sustainability, to sharing what they have learned, and finally putting it into action by engaging in activities that both support Comerica as a more sustainable organization and bring sustainability to colleagues' personal lives. By year-end 2018, we had 318 Comerica colleagues enrolled in the MSA Program.



We also offered our colleagues the opportunity to participate in the following Northwest Earth Institute (NWEI) sustainability offerings:

- The NWEI EcoChallenge is set up to help people change habits by sticking to environmental and health commitments for several weeks. Over 200 colleagues joined in the March and October EcoChallenges.
- A Different Way: Living Simply in a Complex World webinar discussion series provided colleagues with information about being mindful and present, consuming less, keeping connected, and living a life of happiness and meaning. Over 100 colleagues participated in the 5-part webinar series.

Green Office Teams

Ten active green office teams, made up of dedicated volunteers based at our larger office buildings, organize year-round sustainability awareness and community involvement initiatives. In 2018, our teams coordinated and participated in numerous office and community-based events, including environmental volunteering projects, colleague contests, children's art contests, clothing exchanges, nonprofit item donations, lunch and learn educational events, and coordination of local colleague personal document shred days.



Communicating with Colleagues

We keep our approximately 8,000 colleagues informed about company activities through a variety of communication channels, such as email, our intranet site, town halls ('Employee Owner Meetings') and one-on-one discussions with managers. The Comerica Café, part of our intranet site, helps colleagues further engage and share information with other colleagues. The Café includes blogs from Comerica leaders providing business, economic, government relations and sustainability-related insights. The site also includes fun ways to connect with other colleagues via photo albums about work (such as Comerica Pride, Volunteerism events, Partner Appreciation) and non-work (babies, sustainability at home, pets, travel), as well as discussion boards on recipes, health and wellness, travel tips, and hobbies, to name a few.

To improve performance, we provide our colleagues with the following pathways to engage with senior leadership:

Employee Pathways for Communicating with Senior Leadership

- Communicate directly with non-management directors of our Board by sending written correspondence to the Secretary of the Board for Comerica Incorporated
- Provide feedback to leadership through Senior Officer Meetings, Employee Owner Meetings, managers and company email
- Email the Chief Human Resources Officer directly or raise questions at the Employee Owner Meetings about benefits or other human resources topics
- Connect through departmental leadership meetings
- Email a designated mailbox with ideas on how to improve processes, programs and efficiencies at Comerica

Comerica provides multiple channels for employees to report complaints, including our intranet site, communicating directly with managers, Human Resources, Employee Relations, the Legal department or the two employee hotlines (anonymous and confidential) operated by a third party. One employee hotline is for reporting and resolving human resources issues, such as workplace harassment or safety, while the other is for accounting or audit-related issues. Refer to the Our Codes of Conduct sub-section under [Anti-Corruption, Ethics & Countering Bribery](#) for more details on how we provide employees with the opportunity to formally address their concerns.

DIVERSITY AND INCLUSION

Diversity & Inclusion

Impact Topic

Diversity and Inclusion Vision



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

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

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

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

2018 PROGRESS

Increased the number of military veterans by 54 percent since implementing our veteran outreach strategy in 2014.

Continued growth for minorities in officer roles throughout the company. Over the last 5 years, the representation of minority vice presidents increased over 17 percent.

Improved diversity education and awareness opportunities through our Masters of Diversity Awareness Program, as well as a revamped required senior leadership training focused on implicit bias to ensure improved inclusion throughout the bank.

Increased outreach to diverse business owners through training and networking sessions as part of our supplier diversity program.

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| 2018 CHALLENGES | Developing an inclusive work environment led by our managers and supervisors while empowering colleagues to commit to the same inclusive values. |
| | Driving minority colleague development, retaining top minority talent and ensuring that minorities at the manager level and above convert to successful leaders. |
| | Growing Comerica's market share of women and minority-owned small and medium sized business relationships while supporting the individual wealth and multi-cultural market communities. |
| | Increasing colleague volunteer hours in each of our key markets. |

Leadership and Accountability



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

- Curt Farmer, President and CEO, Comerica Incorporated and Comerica Bank

Internally, leadership and accountability for our diversity and inclusion efforts starts at the highest levels of the company. Comerica supports diversity and inclusion through our Executive Diversity Committee (EDC), which sets strategy and addresses key issues and topics relating to diversity and inclusion. The EDC is made up of the top 12 officers at Comerica and Nathan Bennett, our Chief Diversity Officer. Curt Farmer, President and CEO, serves as the EDC Chairman. In addition, EDC members are required to include diversity and inclusion as part of their annual performance management plan, as measured through a Diversity and Inclusion Scorecard, and to include diversity objectives throughout their lines of business.

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

- Workforce Diversity (Workforce Utilization, Employee Engagement, Talent Acquisition, Succession Management)
- Business Outreach
- Social Impact (Volunteerism, Contributions, Social Responsibility)
- Risk and Compliance (Supplier Diversity, Affirmative Action, CRA Service)

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

Our roadmap and strategic areas are integrated in the following diagram:

Diversity and Inclusion Strategy Roadmap

| Satisfy Shareholders: | Grow Revenue | | Increase ROI |
|---|--|-----------------------|----------------------|
| Workforce Diversity: | Business Lines: | Diversity Teams: | Business Partners: |
| Business Outreach: | Increase Penetration of Target Markets | Relationship Building | Centers of Influence |
| Social Impact: | Support the community | Volunteer Resources | Promotes Allies |
| | Social Value | Social Responsibility | Links Target Markets |
| Compliance and Risk (Supplier Diversity, EEO and CRA): | Supports Business | Impact Community | Grow Community |

Employee Diversity and Inclusion

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

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

Diversity and Inclusion Recognition

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

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

These rating organizations have consistently ranked Comerica among the top companies for diversity efforts. We also recently received our sixth consecutive CEI rating of 100 for our work to ensure inclusion of Lesbian, Gay, Bisexual and Transgender (LGBT) colleagues and community members. Comerica was also named to *LATINO Magazine's* 2018 "LATINO 100" list of the top 100 companies for the sixth year in a row. On a regional level, Comerica was named to the Texas Diversity council's Top 25 Companies for Diversity & Inclusion as well as *Corp! Magazine's* "Salute to Diversity" award in Michigan. Additionally, Comerica was recognized in 2018 as a silver-level veteran friendly employer by the Michigan Veterans Affairs Agency.

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

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

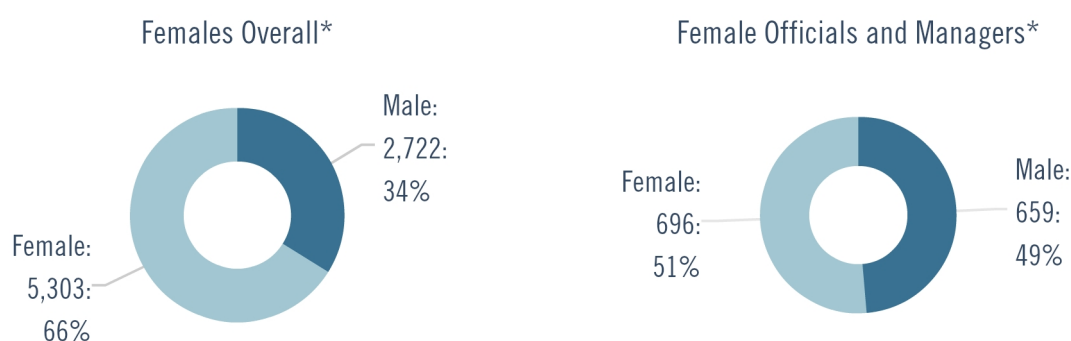
Employee Demographics

| 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. (Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose) |

Advancing diversity in our workforce is a business imperative. In 2018, we continued our organization-wide focus to improve recruitment and retention of women and ethnic minorities especially in leadership positions through our diversity outreach, diversity awareness and learning program, and our leadership development programs.

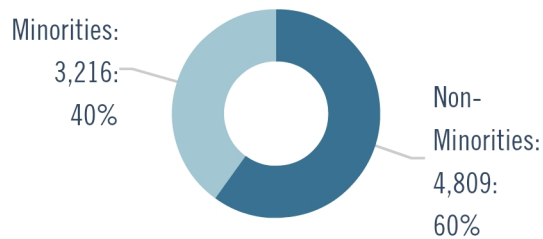
2018 Workforce Diversity Metrics

Overall, the percentage of female employees working at Comerica has remained generally consistent since 2017 and are the majority portion of our population at 66 percent. Additionally, over half (51 percent) of our officials and managers are females. The officials and managers metric is developed utilizing manager-level EEO-1 reporting categories.

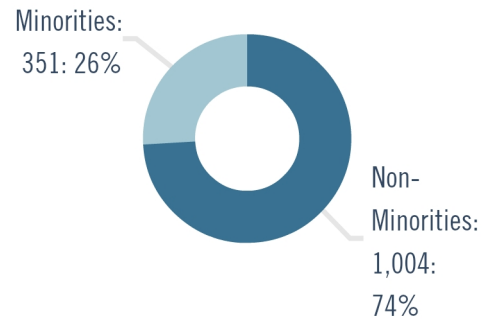


The percentage of ethnic minority employees working at Comerica has increased from 38 percent in 2016 to 40 percent in 2018. Our officials and manager population is made up of 26 percent ethnic minorities.

Ethnic Minority Overall*



Ethnic Minority Officials and Managers*



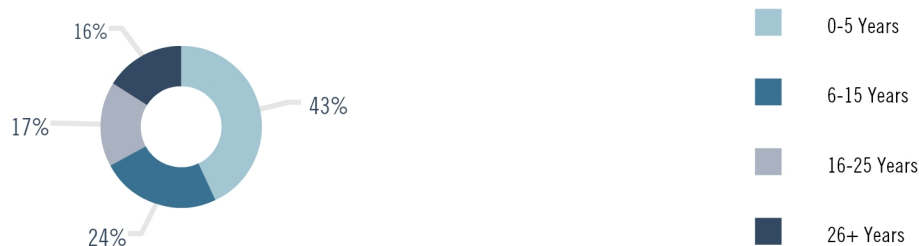
*Data as of 12/31/2018. For previous year data, refer to the [Key Statistics Table](#).

Comerica also tracks additional metrics including generation and tenure. From a generational perspective, Gen X makes up the largest group of employees at 39 percent of our workforce. Additionally, the Millennial population continues to increase and is now 31 percent of our workforce up from 28 percent in 2017. Furthermore, while 43 percent of Comerica's workforce has between zero and five years of service, Comerica's workforce is also highly tenured with 33 percent of our employees with 16 or more years of service. As the Millennial population continues to grow in the workplace, Comerica is sensitive to generational differences and work style. We offer various diversity training programs that address these differences and how employees can more effectively work together.

Employee Generation Metrics



Employee Tenure Metrics



Pay Equity

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

Employee Diversity and Inclusion Engagement

We encourage employees to form Employee Resource Network Groups (ERNGs) comprised of colleagues with common interest. ERNGs are usually formed for support, discussion and networking, as well as awareness building.

Comerica's Employee Resource Network Groups

To meet our human capital and business development goals, we conduct targeted recruitment activities and support 16 ERNGs. ERNGs are self-initiated, organized groups consisting of employees with common interests and the willingness to apply those interests to support Comerica on a variety of business issues. ERNGs are open to any employee, regardless of identity, background or organizational unit and provide peer networking, mentoring and development opportunities.

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

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



Comerica Women's Forum members collected nearly 900 dresses during annual prom dress drive to help girls in our markets have a great prom experience.



Comerica LGBT & Allies teams participated in PRIDE festivals in all markets and handed out these Comerica bracelets.

Diversity Awareness and Learning

We encourage our colleagues to embrace and celebrate each other's differences and require that they complete diversity education courses to foster an atmosphere of inclusion in the workplace. We feature our diversity program in our employee orientation and require annual employee diversity learning. In 2018, this learning program focused on bias and microaggressions in the workplace. In previous years, some examples of the topics we focused on were military veterans, disabilities in the workplace, generations, and LGBT and allies in the workplace.

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

In addition, our company-wide Master of Diversity Awareness (MDA) Program, developed by Comerica colleagues, achieved an 88 percent enrollment in 2018. MDA covers nine dimensions of diversity through a variety of activities, and has created a healthy competition to earn bronze, silver, gold and platinum status for achievement of different learning levels.

| <i>Year-End 2018 Status: Number of Colleagues Who Achieved MDA Level Certifications*</i> | | | |
|---|-----------------------------------|---------------------------------|-------------------------------------|
| 5,122 | 4,221 | 3,396 | 2,021 |
| Bronze-Level Certified Colleagues | Silver-Level Certified Colleagues | Gold-Level Certified Colleagues | Platinum-Level Certified Colleagues |
| * Cumulative (e.g., colleagues who are MDA Gold-Level certified are also included as certified at the Bronze- and Silver-Level) | | | |

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

Comerica continues to emphasize the importance of hiring and supporting individuals with disabilities. For the last two years, a training was provided to our entire Talent Acquisition and Human Resources team on how to source, interview, accommodate and position candidates with disabilities.

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

Comerica Celebrates Diversity Events

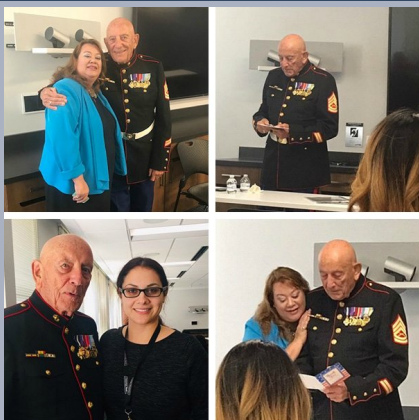
Comerica Celebrates Diversity



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

Recognition celebrations held in 2018 include Black History Month in February, National Women's History Month in March, Asian Pacific Heritage Month in May, LGBT Pride Month in June, National Hispanic-Latino Heritage Month in September/October, National Disability Employment Awareness Month and Diversity Awareness Month in October, and Veterans Day in November.

Comerica Celebrates Diversity Events in our Markets



In honor of Veterans Day, Comerica colleagues in San Jose invited Korean War Veteran, Gunnery Sergeant William "Denny" Weisgerber, to talk about his life experiences.



To celebrate Black History Month, our Comerica African American Network ERNG hosted a recognition event.

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

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

Attracting Diverse Talent

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

In an effort to support diverse recruiting in 2018, Comerica enhanced our national diversity outreach strategy which focused on key relationships with national and regional organizations, connecting with diverse student organizations on campus and connecting with community-based organizations in our local markets. Comerica developed relationships and sponsored events with the following organizations:

- Accounting and Financial Women's Alliance (AFWA)
- Association for Latino Professionals in Finance and Accounting (ALPFA)
- Arab Community Center for Economic and Social Services (ACCESS)
- Hispanic Alliance for Career Advancement (HACE)
- National Association of Black Accountants (NABA)
- Prospanica

Outreach to Individuals with Disabilities

Comerica continued our partnership with GettingHired, an organization focused on outreach to individuals with disabilities, to further our reach and expand our branding to the disabled community. Additionally, Comerica partnered with Michigan Rehabilitation Services and they conducted a disability awareness training for our Human Resources and Talent Acquisition colleagues.

Comerica has an active veteran's recruitment strategy, which is communicated regularly to human resources professionals, hiring managers and executives. Several veteran-specific strategies and practices to attract veteran talent include connecting with the Veteran Leadership Network ERNG and the Veteran Market Segmentation Initiative (MSI) team for veteran referrals, implementation of veteran-friendly job qualifications, and specific relationships with local and regional veteran representatives. Comerica has a strong relationship with the Michigan Veteran Affairs Agency and participates in the U.S. Chamber of Commerce job fairs. In addition, Comerica has provided support on a national level for the Employer Support of the Guard and Reserves (ESGR). In 2018, the Michigan Veterans Affairs Agency selected Comerica as a Silver Level Certified Veteran Friendly Employer recognizing Comerica's dedication to recruiting, hiring, training and maintaining veteran talent.

Outreach to Veterans

Comerica is one of 10 companies participating in the Guard and Reserve Interview Promise (GRIP) program pilot sponsored by the Michigan Veteran Affairs Agency. Under GRIP, military-friendly employers like Comerica promise to interview Guard and Reserve members whose military occupational qualifications meet appropriate job opening classifications as determined by a workforce assessment with the employer.



Comerica participates in outreach and recruitment efforts to hire undergraduate and graduate talent. We connect with students in various ways through attending career fairs, participating in on-campus interviews and hosting sessions to share information about Comerica and our entry-level career development programs. In 2018, Comerica further enhanced our outreach to diverse students through connecting with campus chapters of ALPFA and NABA as well as connecting with diverse student organizations.

Comerica partners with organizations in our local markets to connect with youth and adults to expand interest in finance, accounting and technology careers. Comerica is a partner with BankWork\$ in our Texas and California markets, where we participate in the program, graduation and ultimately hire graduates from this program.

Outreach to Diverse Youth



Human Resources colleagues Sylvia Carter-Smith and Lori Walker interviewing students at the GDYT career fair.

Comerica has been a partner with the City of Detroit's Grow Detroit's Young Talent (GDYT) program for a number of years. This is a city-wide summer jobs program that employs young adults between the ages of 14 and 24. This city-wide effort gives young adults exposure to the world of work and enhances their educational, work readiness and leadership skills.

In 2018, Comerica employed seven interns in various departments where they gained valuable skills. As a part of their internship, the students were given the opportunity to meet and hear a presentation from our Michigan market president. Additionally, the interns were involved in a volunteer event as well as participated in a detailed financial education seminar.

Board Diversity

Impact Topic

Comerica strives to have a diverse Board that represents the interests of Comerica's four core constituencies: shareholders, employees, customers and communities. The Governance, Compensation and Nominating Committee considers diversity in assessing potential director nominees. For example, the committee seeks nominees with a broad range of experience, professions, skills, geographic representation and/or backgrounds. Nominees are not discriminated against on the basis of race, religion, national origin, sexual orientation, disability or any other basis as proscribed by law.

2018 Board Composition

| | | |
|--|---|---|
| 10 of the 12 Comerica Board members are independent. | One director is Hispanic, two are African American, and nine are Caucasian. | Three of Comerica's directors are female and nine are male. |
|--|---|---|

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.

Reaching Diverse Customers

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

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

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

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

2018 Diverse Customer Outreach in Action

| | | |
|--|--|---|
| The Texas Women's MSI team held business networking events designed to help women professionals and business owners expand their networks and build success. | Michigan MSI teams joined with Comerica procurement to support minority business owners at the National WBENC conference in Detroit. Comerica leaders counseled business owners about preparing to compete for corporate contracts | California teams supported a number of professional associations, including the National Association of Asian American Professionals and Oakland African American Chamber of Commerce supporting cultural interests and building relationships. |
|--|--|---|

In 2018, 19 MSI teams were operating across our markets, and garnered more than \$300 million in total in new account openings from business referrals.

Supporting Customers and Prospects

MSI teams host special events where business owners and professionals can network and get information that supports their business and personal financial success. Comerica supported the 2018 Business Diversity Summit and Forum hosted by the Phoenix Minority Business Development Agency (MBDA) Business Center and the Arizona Hispanic Chamber of Commerce. The 2018 Summit was held at the Phoenix Convention Center and spotlighted the growing contributions of minority-owned businesses in Arizona.



Supplier Diversity

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

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

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

We establish annual supplier diversity spend goals based on our projected discretionary spend. We track spending with our diverse suppliers quarterly to ensure we meet our goals. Our Corporate Purchasing Department includes a senior-level Supplier Diversity Manager, who works with regional contacts to identify and support diverse vendors. For contracts originating in 2018, our goal was to spend \$51 million of this discretionary spend with diverse suppliers.

Diverse Supplier Discretionary Spend

| Year | 2017 | 2018 |
|-----------------------------------|--------------------------|------|
| \$ Millions* | 64.1 | 64.9 |
| Discretionary Spend Goal Progress | Goal exceeded both years | |

*For previous year diverse supplier discretionary spend, review the [Key Statistics Table](#).

We also ask our Tier 1 strategic supply partners, as identified by our business units, to support our supplier diversity initiatives by achieving, at minimum, 25 percent diverse sourcing from their suppliers. We monitor their performance during regularly scheduled business reviews. In 2018, we achieved \$21.9 million through our Tier 2 supplier diversity reporting, a 13 percent increase over 2017.

Comerica's standard Request for Proposal (RFP) language for sourcing opportunities includes questions concerning supplier diversity. Comerica's National Supplier Diversity Manager reviews supplier lists for each sourcing opportunity to ensure that, where possible, diverse firms are included. In 2018, 50 percent of RFPs tracked included diverse suppliers. Of that, 34 percent were awarded to diverse suppliers.

2018 Supplier Diversity Recognition

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

Among Best of the Decade for Supplier Diversity by Minority Business News USA

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



Expanding California Outreach to Diverse Businesses

Comerica hosted two Supplier Diversity Networking Sessions in California in 2018, one in Los Angeles in March and one in Oakland in November. To increase the opportunities for the diverse businesses, we invited some of our large supplier partners (like Accenture, CBRE, Apple and others) to join us at both events. We also partnered with local advocacy organizations like the National Association of Minority Contractors-Southern California and the Oakland African American Chamber of Commerce, as well as the Southern MSDC and Western Regional MSDC to ensure that we would reach the target audience. More than 50 diverse business owners attended the sessions and made valuable connections.



To support access to our business for women-owned firms, we partner with the Great Lakes Women's Business Council and the National Association of Women Business Owners Greater Detroit Chapter in Michigan, among other regional chapters. Comerica staff serve on boards and committees for many of these organizations and we participate in trade fairs and networking events that help diverse business owners access our procurement decision-makers. During 2018, the Women's Business Enterprise National Council held their annual conference in Detroit. Comerica hosted a booth at the conference and participated in one-on-one matchmaking sessions where Comerica colleagues met with dozens of certified woman-owned businesses throughout the conference. In 2018, Comerica's Women's Network initiative worked with the Great Lakes Women's Business Council to host quarterly webinars for women-business owners on the topics of maximizing your investments in trade shows, benefiting from your banking relationship, leaving your mark through legacy planning, and bringing sustainable business practices into small- and medium-size enterprises.

ENVIRONMENT

At Comerica, we understand that the efficient use of natural resources is key to a sustainable future. In line with this understanding and our Core Values, Comerica is committed to acting responsibly and implementing practices as highlighted in our [Environmental Policy Statement](#).

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/communication.

| | |
|------------------------|--|
| 2018 PROGRESS | Launched new GHG reductions goals for 2025, 2030 and 2050 after having exceeded our GHG real estate emissions reduction target three years early in 2016. |
| | Reduced our real estate Scope 1 and 2 emissions by an additional 20 percent (2018 vs. 2017) for a total 43.5 percent reduction since 2012. |
| | Reduced our water consumption by 27.6 percent since 2012 and we are on track to meet our 30 percent water reduction goal by 2020. |
| | Reduced our office copy paper consumption by 3 percent (2018 vs. 2017; 48.5 percent reduction since 2012) and we are on track to meet our 50 percent paper reduction goal by 2020. |
| | 36 percent of Comerica's discretionary spend on goods and services was screened for environmental sustainability in 2018. |
| 2018 CHALLENGES | Our environmentally beneficial loans and commitments decreased by 7 percent over 2017 in part from the roll out of new lending and credit platforms, which delayed relevant green loan training and associated communications. |
| | We saw a 3 percent decrease in the average sustainability score of the group of suppliers scored in 2018 primarily due to suppliers being less transparent in their responses. |

Comerica's Environmental Management Process

Environmental sustainability is embedded into our corporate culture and day-to-day operations. We manage underlying and arising issues relating to environmental sustainability in our operations and supply chain through a variety of structures, including our Corporate Sustainability Office, cross-functional teams, operations-related departments and our Sustainability Council, encompassing senior-level staff from across the bank who set Comerica's sustainability strategy and goals. The Enterprise Risk Committee of the Board of Directors reviews and approves our sustainability strategy on an annual basis. The Sustainability Office develops and executes an annual action plan that is approved by the Sustainability Council to ensure we continue making significant progress on our environmental sustainability goals.

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 |
|---|--|--------------------------------|--|--|

For information on our quantitative short- to long-term environmental sustainability goals, review the [Managing Environmental Impacts of our Operations](#) section of the report. Additional details on our Environmental Management process are included in the following sections.

Managing Environmental Impacts of our Operations

Our operational environmental impacts include GHG emissions, water use and waste generation, as well as the procurement of the goods and services needed to operate our business. Our Corporate Sustainability Office evaluates and manages the risks and opportunities associated with these impact topic areas in collaboration with the business units responsible for the relevant operations. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight.

Each quarter, a detailed report is produced to track progress across our environmental Key Performance Indicators (KPIs). This KPI report tracks utility-related water and energy usage along with data for other reported sustainability-related activities, such as corporate travel, waste creation and paper use. We analyze the results and trends from these reports and share them with key decision makers, such as our Corporate Real Estate leadership, the Corporate Sustainability Office and the Sustainability Council, which includes the Chief Financial Officer, the executive sponsor of Comerica's Corporate Sustainability Program. We also relay relevant information and metrics to our Facilities Management and Engineering teams to keep them informed of our facilities' performances which allows them to take action, as appropriate, to help ensure we meet our environmental goals.

The Corporate Real Estate and Facilities Management teams also manage environmental and human health issues, such as indoor air quality, lead-based paint and mold. When concerns arise, we closely follow industry and regulatory procedural guidelines and incidents are tracked and reported to the company's Environmental Health Committee, which meets quarterly to evaluate new concerns and determine company-wide and site-specific protocols.

Comerica's Re-Imagined Office Layout (CoWork)

Comerica's re-imagined office layout (CoWork) program delivers a seamless mixture of individual spaces and a variety of shared collaboration and meeting spaces, providing colleagues with flexibility and choices in their workspace options. In 2018, we implemented CoWork at four new locations, two each in Texas and Michigan, and a fifth which neared completion in California. CoWork has helped us to make more efficient use of our real estate space. As part of the renovations, we have implemented improved ergonomic seating and sit-stand furniture, used low volatile organic compound products (carpet tile and glue and mill work stain and paint) and Green Guard-certified products, incorporated LED lighting with motion sensors to assist in energy reduction and added solar shades to interior windows to improve heating and cooling of the space.



View of Comerica CoWork space in Fort Worth, Texas

| | | |
|-------------------------------|-----------------------------------|---|
| 11 | 172,000 | 700 |
| Total CoWork Sites since 2015 | Total Square Feet of CoWork Space | Number of colleagues in CoWork Office Locations |

To ensure our CoWork renovations had as positive of an environmental and social impact as possible, we donated, sold, reused or recycled former furniture and artwork, when feasible. As a result, in 2018, we donated over 500 pieces of furniture, numerous office supplies to schools, churches and other nonprofit organizations, and raised approximately \$5,000 for nonprofit organizations through colleague artwork auctions. Altogether, we engaged with over 30 nonprofits in the process.

Climate Change Impacts

Impact Topic

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. 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. Climate change risks associated with operational impacts are generally handled by the Corporate Sustainability, Corporate Real Estate and Corporate Purchasing offices. These climate-related operational risks include GHG emissions, water use and waste generation, as well as procurement of the goods and services needed to operate our business. Climate-related opportunities include lending to environmentally beneficial or green companies and projects, as well as reducing our own costs and risks and enhancing our reputation and brand. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight on the management of these risks and opportunities.

Since 2007, we have annually disclosed our emissions reduction strategy and efforts through CDP's climate change questionnaire. We have been awarded recognition 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.

In 2018, CDP's questionnaire included new disclosures in line with recommendations from the Task Force on Climate-related Financial Disclosures (TCFD). Accordingly, in our 2018 submission to CDP, we included more detail about our governance approach, risk management framework and our identification of climate-related risks and opportunities. We will continue to work to address the TCFD recommendations and disclose our progress through future CDP responses.

Comerica Accepts Climate Leadership Award

In March 2019, Comerica was recognized for a second consecutive year for excellence in greenhouse gas emissions management. The Climate Leadership Awards, sponsored by C2ES and The Climate Registry, took place during the Climate Leadership Conference, which brought together forward-thinking leaders from business, government, academia, and the nonprofit community to address climate change through policy, innovation and business solutions. Specifically, Comerica was recognized with a Greenhouse Gas Goal Setting certificate for our work in setting our current short-, medium- and long-term greenhouse gas reduction goals.



Energy & Emissions

Impact Topic

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. This work also brings multiple environmental and business benefits, as we believe higher-performing buildings help create a more desirable workplace, improving colleague retention and attraction, customer appeal, and company profitability.

Energy Management

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.

Total Energy Consumption

In 2018, we continued to make great progress in reducing energy use while carefully managing our financial resources to maximize the impact of our investments. In 2018, our total energy consumption was 413,359 billion joules or 114,822 Megawatt-hours (MWh). Comerica decreased its direct and indirect energy consumption in facilities by 7,172 MWh, or 6 percent, from 2017, primarily related to investments in energy efficiency projects. As detailed below, our energy-efficiency investments in 2018 included installing new building management system (BMS) controls or smart thermostats and upgrading lighting as part of a multi-year improvement plan. Further, we reduced the total square footage of Comerica's portfolio of buildings and added greater energy efficiency awareness in facilities management, which also had an impact on our energy use.

In 2018, our key energy management initiatives included:

- Energy efficiency projects designed to provide significant energy usage reductions, including our enterprise-wide Building Management System (BMS)/Smart Thermostat project and LED lighting upgrade project (See feature boxes on these projects for more details).
- An in-depth energy audit performed at one of our largest facilities, which identified opportunities for improved energy efficiency (recommendations being reviewed for possible implementation in 2019 or 2020).
- Expanding our collaborative CoWork office design to eleven buildings across the country, by adding four more locations in 2018. CoWork spaces have removed 347,992 square feet (-7.3 percent) of occupied real estate space from 2017 and increased energy efficiency per employee, with more open space to allow air circulation, natural lighting, and zone HVAC controls.
- Continuing company-wide Temperature Standards Policy whereby standards for set-point and set-back temperatures have been established and are monitored so Comerica maintains operational control over heating, ventilation and air conditioning (HVAC) systems. In 2018, we began an energy-focused review of all buildings with new BMS or Smart Thermostats to ensure settings are correct and sensors are operating properly.
- Implementing the Mission Control team's Comprehensive Management Plan to manage the energy usage in our data centers. Through our regular monitoring of consumption patterns and trends following energy conservation measures being implemented, we can assess the environmental impacts of our investments.

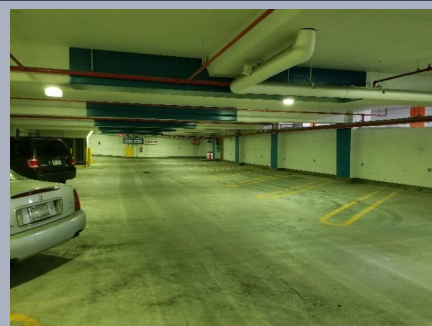
Building Management System Project

We conducted an enterprise-wide Building Management System (BMS)/Smart Thermostat project in 2017 and 2018 to provide remote diagnosis, monitoring and programming controls for HVAC systems to improve energy efficiency. In 2018, we added smart thermostats or improved BMS to 68 buildings, completing our two-year major investment in smarter building system technology (total of 313 Comerica locations upgraded in 2017-2018). The more complicated and larger building systems were addressed in 2018. These improved systems provide much greater control over heating, ventilation, and air conditioning systems and can be viewed, diagnosed, and controlled remotely. The sites with smart thermostats are programmed to minimize energy use during unoccupied times, including irregular banking holidays. An analysis of utility bills found the new, smart controls and upgraded lighting over the last two years helped Comerica save more than \$2.2 million in utility costs through 2017 and 2018 versus the 3-year average utility spend at the upgraded locations prior to project implementation.

LED Lighting at Comerica Bank Center in Detroit, Michigan

Comerica's 2017-2018 LED installation project was designed to improve lighting quality, while reducing energy consumption throughout our buildings and reducing the labor required for maintenance. LED lighting was installed at an additional 25 locations in 2018 (for a total of 52 locations in 2017-2018).

At one of Comerica's larger facilities, 20,571 lamps were replaced within almost half the number (11,156) of light fixtures. 187 of the lamps were installed within the parking garage, replacing older LED lamps installed several years ago. The new LEDs in the garage contain integrated motion control (dimming and brightening non-critical lights upon motion detection), which yields additional energy savings without jeopardizing light levels needed to properly operate the garage. Altogether, the new lamps use 50 percent less energy per lamp, resulting in a total annual energy reduction of over 950,000 kilowatt-hours.



Before LED Project

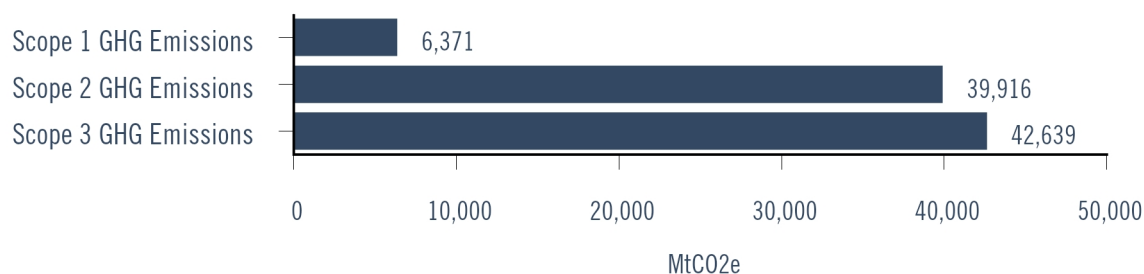


After LED Project

GHG Emissions Management

As part of a longstanding commitment to reduce our carbon footprint, we track and publicly report GHG emissions. We follow the most up-to-date Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard to account for and calculate Scope 1 and 2 GHG emissions from our operations. In addition, we follow the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard to account for and calculate Scope 3 GHG emissions. Again, in 2018, we also obtained independent, third-party verification (limited assurance level) for our Scope 1, Scope 2 and Scope 3 GHG emissions. For more detailed information on Comerica's GHG emissions, such as gases, the verification letter and methodologies used in our Scope 1, 2 and 3 GHG calculations, refer to our most recent [CDP Response](#).

2018 Total Reported Greenhouse Gas Emissions



Scope 1 and 2 GHG Emissions Reduction Trends

Real Estate-Related Scope 1 and 2 Emissions

We have set GHG reduction goals for emissions associated with our real estate operations. Our GHG goals plan to drive reductions averaging approximately three percent annually, a figure generally considered to be in line with "science-based" GHG reduction targets.

Real Estate Scope 1 and 2 Greenhouse Gas Emissions Goals

| Goal Generation | Goal | Status |
|--|--------------|--|
| 1st Generation | 15% by 2015 | Exceeded goal at year-end 2013; vs. base year 2008 |
| 2nd Generation | 20% by 2020 | Exceeded goal at year-end 2016; vs. base year 2012. We have exceeded our 2020 goal by 217%. |
| Current 3rd Generation: short-, medium- and long-term goals | 50% by 2025 | Achieved a 43.5% (35,056 MtCO _{2e}) reduction vs. base year 2012 at year-end 2018. We are at 87% of our 2025 goal, 67% of our 2030 goal, and 44% of our 2050 goal. |
| | 65% by 2030 | |
| | 100% by 2050 | |

| | | | |
|--|---------------------------------|----------|---|
| 2018 Total Scope 1 and 2 Real Estate-Related GHG Emissions | 45,477 MtCO_{2e} | ↓ | In 2018, we reduced our real estate-related GHG emissions by 11,752 MtCO_{2e}, or 20.5%, compared to 2017. |
| Scope 1 Real Estate GHG Emissions (natural gas, diesel, refrigerants) | 5,561 MtCO _{2e} | ↓ | Comerica's Scope 1 real estate emissions from natural gas, diesel, and refrigerant use decreased by 120 MtCO _{2e} , or 1.9 percent in 2018 vs. 2017. |
| Scope 2 Real Estate GHG Emissions (metered and estimated electricity, natural gas-heat and propane-heat) | 39,916 MtCO _{2e} | ↓ | Comerica's Scope 2 emissions decreased by 11,710 MtCO _{2e} in 2018 vs. 2017 (a 23 percent reduction). The reductions in metered and estimated electricity usage were the largest components of the Scope 2 decrease. The real estate emission decreases in 2018 were primarily related to the 120 energy and sustainability improvement projects implemented at Comerica locations in 2018 and the real estate square footage reduction of more than 300,000 ft ² compared to 2017. |

Travel Emissions (Scope 1)

As a relationship-based bank, traveling to meet clients is a critical part of our business. We track and manage Scope 1 emissions from our company fleet vehicles and corporate jet.

| | | | |
|--|------------------------------|----------|---|
| 2018 Total Scope 1 Travel-Related GHG Emissions | 810 MtCO_{2e} | ↓ | Our travel activities as a whole decreased by 9 percent. |
| Corporate Jet Emissions | 627 MtCO _{2e} | ↓ | Our corporate jet emissions decreased by 15 percent due to reduced jet fuel used in 2018 and a 8 percent reduction in the emission factor used in our calculations over 2017. |
| Fleet Vehicle Emissions | 183 MtCO _{2e} | ↑ | Our fleet emissions increased 21 percent due to an increase in fleet miles driven partly offset by a 3 percent decrease in the emission factors used in our calculations over 2017. |

We have not set a Scope 1 travel reduction goal. However, in recognition of the GHG footprint from our owned vehicles, Comerica elected to offset 100 percent of the emissions of our fleet vehicles and corporate jet for 2018. Our carbon credits to offset these emissions are from the American Environmental Landfill project in Sand Springs, Oklahoma, and third-party verified by the Climate Action Reserve.

Value Chain (Scope 3) Emissions Trend

We provide emissions data for nine of the 15 Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard categories for Scope 3 emissions. Our total Scope 3 GHG Emissions decreased by 7 percent over 2017 primarily due to a reduction in colleague commuting emissions. While we understand the significance of Scope 3 GHG emissions, we do not believe the data supporting our industry's Scope 3 emissions is sufficiently robust for us to set goals around. In particular, there is no current industry consensus around Category 15 (Investments) Scope 3 emissions nor is reliable data on customer emissions widely available. Comerica will continue to monitor developments around Scope 3 emissions goal setting and will determine if these types of goals may be appropriate in the future.

| <i>2018 Total Scope 3 GHG Emissions</i> | 42,640 MtCO _{2e} | Trend Direction (2018 vs. 2017) |
|---|---------------------------|---------------------------------|
| Purchased Goods and Services (paper, computers, carpet) | 8,578 MtCO _{2e} | ↑ |
| Capital Goods (furniture) | 1,283 MtCO _{2e} | ↑ |
| Energy-Related Activities (electricity line losses) | 1,868 MtCO _{2e} | ↓ |
| Upstream Transportation & Distribution (armored vehicles and shipping) | 192 MtCO _{2e} | ↓ |
| Waste Generated in Operations (landfilled waste) | 514 MtCO _{2e} | ↓ |
| Employee Business Travel (commercial air travel, rental cars, reimbursed personal car use) | 3,453 MtCO _{2e} | → |
| Employee Commuting | 25,544 MtCO _{2e} | ↓ |
| Downstream Leased Assets (subleased corporate jet and properties leased and subleased to third parties) | 1,027 MtCO _{2e} | ↓ |
| Other Downstream (CBRE supplier travel by ground transportation) | 181 MtCO _{2e} | ↓ |

For more details on Comerica's Scope 3 emissions calculations and trends, see our most recent [CDP Response](#). For historical GHG emissions data, see the [Key Statistics Table](#) in this report.

Environmental Resource Management

Impact Topic

We are committed to managing resources wisely by minimizing operational waste. Comerica has three main solid waste streams: paper, electronics and general office. An intermittent waste stream consisting of excess furniture, office equipment and some construction-related materials is generated during office renovations or real estate rationalization (RaCC) projects, but we work to minimize waste from these intermittent streams through reuse and donations, such as those detailed in the overview of our [CoWork program efforts in 2018](#).

Paper

We track all paper purchases across the bank, including everything from office copy paper and envelopes to rolled paper, statements and business cards. We use this paper purchase data as a proxy for our paper consumption.

Paper Goals

| Goals | 2018 Progress | Comments |
|---|---|---|
| Reduce Office Copy Paper Consumption by 50% by 2020 | Achieved 48.5 percent reduction (271 short tons) vs. base year 2012 | In 2018, our office copy paper consumption was 289 short tons. We are on track to achieve our paper reduction goal (need to reduce by an additional 1.5 percent by year-end 2019.) |
| Annual office copy paper goal: At least 30% post-consumer recycled (PCR) content and be FSC-certified, where feasible | 95 percent of office copy paper purchased contained 30 percent PCR content 99 percent of office copy paper was FSC certified | Paper quantities and environmental attribute trends are measured on a quarterly basis so we can alter our paper purchase procedures if needed to meet our reduction and environmental attribute goals. We also use recycled content paper for other paper types, wherever possible, based on paper attribute needs and cost considerations. |

Key actions that have led to progress on office copy paper reduction goal include a continued focus on our managed print services operations, working to reduce inefficient paper processes, implementing new client software systems that require less printing during the loan process, allowing colleagues and their managers to assess their individual print progress data, and expanding wireless networking and software solutions to support colleagues with paperless meetings. For the complete breakdown of our 2018 paper quantity, attribute data and intensity metrics, see the [Key Statistics Table](#).

Paper Savings through eSignature Project

In 2018, Comerica's Purchasing and Legal departments initiated a new contract management process that centralizes our third-party contract repository and uses electronic signatures, helping to reduce our paper consumption through digitization. This new process is anticipated to remove the need to print more than 1,000 multi-page contracts per year. Additionally, it is expected to reduce off-site file storage of printed contracts, reduce emissions and shipping costs of sending paper documents with handwritten signatures, and the need for our suppliers to print documents on their end, as our contracts can now be counter-signed using the eSignature process.

Waste

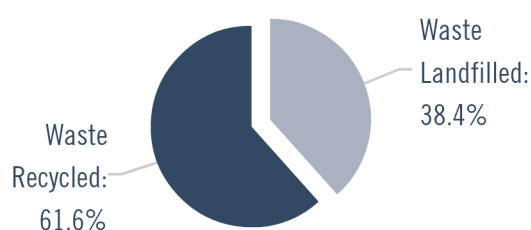
Comerica has maintained a national contract with a single waste disposal vendor since 2012. This vendor has an established standard of practice for waste handling and provides valuable data from our portfolio of managed facilities on the types and schedule of material collection. Additionally, we track other recycled items (electronics, paper, cardboard, pallets and universal wastes) through our service vendors. Comerica's general waste streams are considered non-hazardous. Some of our capital projects involve demolition-generated asbestos-containing materials, which are handled in accordance with applicable regulatory guidelines. 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.

Waste Reduction Goal

| Goal | 2018 Progress | Comments |
|---|---|---|
| Reduce Office Waste to Landfill 20% by 2020 | Achieved 29.1 percent reduction (606 short tons) vs. 2012 base year (Exceeded goal four years early in 2015). | In 2018, our waste sent to landfill totaled 1,480 short tons. Our waste reduction goal is focused on general office waste sent to landfill (such as non-recyclable packaging and operational wastes that are collected in office trash cans). |

A full breakdown of waste by type and disposal method for current and previous years can be found in our [Key Statistics Table](#).

2018 Waste Diverted from Landfill



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

Water Stewardship

Impact Topic

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.

Water consumed at Comerica's facilities (drinking water, water used for restrooms, kitchens and cafeterias, and landscape irrigation) is sourced through local water utilities. A few Comerica-owned locations in Michigan are also equipped with on-site ponds and wells that provide water for landscape irrigation and pond maintenance purposes. The water used inside the buildings is discharged through local water utility sewer systems. Primarily, irrigation water infiltrates the landscape.

We track our water consumption at locations where we are responsible for our water utility bills (our metered sites) by evaluating water bills for any anomalies in consumption or spend, which may indicate leaks or theft. This consumption data is then added to our energy management system, which we use to evaluate data trends quarterly. The trend data helps us understand weather-related impacts on our water consumption, impacts associated with water efficiency measures and impacts resulting from property leaks. In 2018, Comerica's locations with metered water totaled more than 3.1 million square feet, representing 71 percent of our total occupied square footage.

As a company, Comerica's water usage is split closely between domestic (interior) water use and landscape irrigation activities, although facilities with irrigation systems in place use a much larger proportion of their water for that purpose. To assist in using water more efficiently, Comerica has incorporated Weathermatic irrigation controls systems at 28 sites in Texas, Arizona, California and Michigan. These controls adjust irrigation schedules and timing based on local weather, soil permeability and plant type. We continue to evaluate our properties for the potential for smart irrigation technology or conversion to low-water or drought-tolerant landscaping, and have added language to our regional landscaping contracts to further promote regular inspections of irrigation systems and site-tailored watering schedules based on plant needs, soil type and topography. Our Facilities Management team has also been trained on how to monitor for water leak or water waste situations at their managed facilities. As water conservation is a

focus area for Comerica in 2019, we will work to identify which investments can lead to the greatest impact in reducing our water usage.

Comerica's current supply chain is not expected to have significant water resource risk issues. The majority of our larger corporate purchases are related to technology and human services. While we do not believe water risk in our supply chain is currently a material issue, we have the ability to monitor and request information and service parameters through our various supply chain sustainability initiatives.

With respect to Comerica's relationships with commercial customers, we can factor water-risk issues into our business decisions on a case-by-case basis. While our industry concentrations are not expected to have widespread or concentrated water risks, we have the ability to assess and mitigate water risk issues through our underwriting processes.

Water Reduction Goal

| Goal | 2018 Progress | Comments |
|---|--|---|
| Reduce Metered Water Consumption by 30% by 2020 | Achieved 27.6 percent reduction (124,531 cubic meters) vs. base year 2012. | In 2018, our water consumption totaled 327,001 cubic meters. Our water reduction goal is focused on water consumed at locations where we are responsible for our water utility bills (our metered sites). We need to reduce water consumption by an additional 2.4 percent to meet our 2020 goal. |

As of year-end 2018, our water consumption remained similar to last year, and we held steady on our progress. The main reasons for a lag in reductions over 2018 was related to drier weather conditions in Florida and Arizona and an easing of mandatory irrigation restrictions in California, which created additional irrigation demand. To offset the increased demand, we provided our facilities teams with refresher training on irrigation system programming, and our landscape crews were required to inspect irrigation systems regularly.

For historic details on Comerica's 2012-2018 water consumption data, refer to the [Key Statistics Table](#) in this report.

External Environmental Impacts

Comerica's external environmental impacts include environmentally beneficial lending, risks and opportunities related to customer real estate collateral used to secure loans and our supply chain products and services. Details of these impacts can be found throughout this section.

Environmentally Beneficial Lending

Our sustainability influence goes beyond our own footprint. One of the most impactful things we do is to provide financial services to those businesses that are driving a sustainable economy. By working with companies involved in environmentally beneficial industries and projects, we are able to support the sustainability efforts of our customers.

IBEW Zero Net Energy Headquarters in Detroit

Originally constructed in 1965, the International Brotherhood of Electric Workers (IBEW) Local Union Number 58 headquarters was transformed to create Michigan's first zero net energy-compliant commercial building. Comerica assisted by providing financing for the renovation of the building, known as the Zero Net Energy (ZNE) Center. The ZNE Center serves as an example for businesses in the region of the opportunities to invest in renewable energy and save money through new construction or existing building renovations.

Initial work was conducted to improve the energy efficiency of the building by over 80 percent, then renewable energy solutions were deployed to bring the net energy use to zero. The ZNE Center features nine bespoke energy producing/saving modifications, including:

- 600 solar panels creating 174kW of electricity
- Over 500 LED lights
- Solar DC to AC power inverters
- Energy efficient windows
- Geothermal grid using 39 boreholes
- SIP panels & vaporshield wall insulation
- Virtual energy monitoring
- Variable refrigerant volume system for heating & cooling
- High performance roof system with R-50 insulation value

IBEW Local 58 didn't need to go far for the expertise for these systems, as each of the contractors were from Detroit or the surrounding communities.



Since 2012, Comerica has tracked environmentally beneficial or green loans within our loan systems. We do this using a list of 14 green loan categories to code loans and commitments to green companies and projects, which can be seen in the table below. We include both inherently green companies and projects, as well as loans where the majority of the funding is being used to achieve an environmentally beneficial purpose. We have intentionally set a high bar with respect to green loan coding to ensure we are not "greenwashing" by overstating results in this area.

We provide resources and guidance to help colleagues accurately code environmentally beneficial loans in Comerica's systems. On a quarterly basis, we share the environmentally beneficial loan data by dollar amount and customer count with Comerica's Sustainability Council. Comerica's Sustainability Office also continues to work with our lending and credit groups to discuss opportunities to provide loans to environmentally beneficial sectors in ways that also meet Comerica's credit requirements.

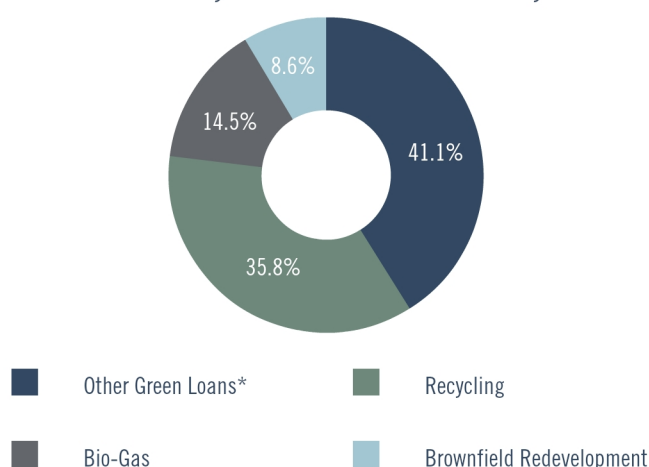
Comerica Tracked Environmentally Beneficial Loan Codes

| | | |
|--|-----------------------------------|----------------------------------|
| Bio-Fuels | Bio-Gas | Brownfield Redevelopment |
| Energy Efficiency | Geothermal, Wave or Tidal Energy | Green Building (New or Retrofit) |
| Green Engineering, Consultation, Evaluation, and Design Services | Other Green Products and Services | Pollution Control |
| Recycling | Smart Grid Technologies | Solar Energy |
| Vehicle Electrification, Advanced Battery and Fuel Cell | | Wind Energy |

At year-end 2018, our environmentally beneficial loans and commitments totaled over \$772 million, compared to \$832 million at the end of 2017, a seven percent decrease. We saw the largest increases by dollar amount in green lending within our Bio-Gas loan code (21 percent increase) and the Other Green Products and Services loan code (29 percent increase) while the largest decreases by dollar amount were seen in the Brownfield Redevelopment loan code (44 percent decrease) and the Green Engineering/Consultation/Evaluation/Design loan code (28 percent decrease). Note that our definition of Brownfield Redevelopment for green loan tracking is different than what is used for Community Reinvestment Act reporting.

As Comerica invests in technologies to enhance our customers experience, increase efficiency and bolster risk management, we have implemented new systems to support our business operations. Given these operational and systems changes over the last two years, our Sustainability Office did not provide direct training on environmentally beneficial loan coding to loan and credit groups until December 2018. At that time, we provided updated training resources to our lending and credit colleagues that explained how to code environmentally beneficial loans properly during our loan evaluation process within the new systems. In early 2019, we also reached out to loan groups where the largest decreases in environmentally beneficial loans were identified over the last two years to ensure that they understand the process for coding relevant loans.

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



* Data as of 12/31/18. The *Other Green Loans* category in this chart includes the following environmentally beneficial loan codes (each represents less than 8 percent of Comerica's total environmentally beneficial loans and commitments):

- Other Green Products and Services (10.8%)
- Wind Energy (6.1%)
- Green Eng/Consult/Eval/Design (5.3%)
- Solar Energy (4.7%)
- Green Building (4.5%)
- Pollution Control (4.5%)
- Vehicle Electrification/Adv. Battery/Fuel Cell (2.6%)
- Energy Efficiency (1.7%)
- Bio-Fuels (0.7%)
- Smart Grid Technologies (0.2%)

Self-Sustaining Renewable Energy Project

When Comerica and our customers' values are aligned, it makes for great long-term partnerships. One example of this is when our customers, Rolling Hills Silver Spur, LP and Michael Tumanjan, who own the Mary Pickford Theater, came to Comerica with a request to purchase solar panels and an associated energy storage plant for the iconic theater in Cathedral City, California. Comerica gave Mary Pickford's solar and energy storage contractor, Aeterna Energy, the opportunity to present the financial plan for this new innovative technology. Comerica provided financing for previous theater renovations and was able to also proceed with the financing of the solar and energy storage system. On September 21, 2018, the Mary Pickford Theater held a "Flip the Switch" event to showcase their new solar and energy storage system. The theater was outfitted with a 620-kilowatt roof-mounted solar system, solar carports, and a 1,000-kilowatt-hour energy storage plant — the first of its kind in California. This application of dual energy saving technologies and controls is now this state's leader toward a clean energy future along with major operational and economic savings. These new green energy technologies are anticipated to save the theater operation more than \$250,000 in the first full year of implementation.

Self-Sustaining Renewable Energy Project



"The Mary Pickford Theater organization members would like to acknowledge and thank Comerica Bank for their forward vision on providing the critical financing in the development of one of the premier privately-owned building energy storage operations in the United States. The California State-mandated green energy goals will continue to see delayed implementation without the availability of financing from conventional banking institutions participating in the 'solar paired with energy storage' marketplace. Comerica Bank has taken a stand as a leader for the environment through their practice of funding long-term sustainable energy technology developments. Without this visionary leadership, no improved change occurs, and the State of California goals will be unattainable!"

— Michael Tumanjan, President, Rolling Hills Estates Silver Spur, Inc.

Environmental Risk Management

Environmental risk is an increasingly relevant and high-profile issue for the private sector. For Comerica, such risk includes both the environmental impact associated with our own operations as well as those impacts of our customers' operations. Comerica's Environmental Risk Management (ERM) Group, within our Enterprise Risk Division (ERD), manages risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate and minimize potential environmental risks associated with loans secured by real estate. Risks associated with the impacts of our operations are managed through the Corporate Sustainability Office in close partnership with Corporate Real Estate, Procurement and other internal business units. Read more about this in [Managing Environmental Impacts of our Operations](#).

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

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

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

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

Most property loan-related environmental due diligence reports are referred to the ERM Group for expert review. In 2018, the team evaluated approximately 1,000 sites, associated with loan amounts totaling approximately \$5.95 billion. These reviews were undertaken for over 200 different customer relationship managers for properties located in 38 different states. Nearly 60 percent of the loans the ERM Group reviewed were for commercial and industrial-type properties, which are more likely to have environmental risks based on historic and/or current site uses.

ERM Group members collaborate with our legal and environmental consulting partners on best practices for managing current and emerging environmental risk issues. They also took leadership or board positions in environmental organizations, such as the Environmental Bankers Association, the Risk Management Association, the Michigan Banker's Association Environmental Affairs Committee and the Michigan Department of Environmental Quality Collaborative Stakeholder Groups. The team also provided ongoing training in each of our key markets for business and credit staff to ensure understanding of the ERM process and the new review request technology. One example of how our environmental review process addressed the risks for a brownfield site redevelopment loan can be found below.

Comerica's Support of Brownfield Transformations

Reviving underutilized land and getting it back into productive, safe use is at the core of brownfield redevelopment, something we have helped support for decades. In this case, Comerica was the agent bank for a syndicated loan transaction with our customer, Trammell Crow, for construction on 51-acres of the Needham Ranch property development in Santa Clarita, California. Portions of the property were historically used for oil and natural gas production, outdoor truck maintenance, and a plant nursery. The planned redevelopment included seven slab-on-grade commercial and light industrial buildings and related infrastructure.

Prior to the loan closure, Comerica's ERM Group was charged with quantifying the risks for remediation of the known and targeted environmental concerns associated with the property based on preliminary environmental assessments.

Our staff also evaluated subsurface investigations which identified hydrocarbon impacts associated with three historical oil wells, a release from a pipeline break associated with the 1994 Northridge earthquake, a former aboveground storage tank, and a former outdoor truck maintenance area.

In accordance with a Voluntary Cleanup Program initiated with the local regulatory authority, remedial action and soil management plans were developed to ensure proper management of the hydrocarbon-impacted soils during the property's redevelopment grading work. Comerica's ERM Group reviewed the investigations and management plans and then used conceptual cost estimates to adjust real estate parameters based on the estimated remedial cleanup costs. As such, we were able to complete the transaction and see a development move forward, which will safely address the legacy contamination.



Grading activities post environmental assessment and remedial clean-up



Buildings under construction on site

Reducing Environmental Impacts in Our Supply Chain

At Comerica, we strive to manage the environmental risks and opportunities of our supply chain. We also endeavor to extend our positive impacts on the environment and our communities by promoting a sustainable supply chain. In our [Environmental Policy Statement](#), we commit to giving preference, where appropriate, to suppliers who demonstrate superior environmental performance. We use an Environmentally Preferred Purchasing program (EPP) to reduce our impacts in our own operations, and we encourage our suppliers to do the same. In our own operations, our Green Purchasing Work Group sources from suppliers and services that meet our environmental criteria, where possible.

Environmental Screening of Suppliers

Sustainability Scoring of Top Suppliers by Spend

For suppliers that fall within our top 30 percent of spend and those suppliers who provide significant amounts of manufactured goods (currently 34 suppliers), we use a 40-question Environmental Sustainability Questionnaire to collect information about their sustainability policies and performance. Beyond the top 30 percent of spend, the number of suppliers increases considerably and therefore limits our potential to provide meaningful engagement on environmental sustainability.

Our suppliers have been separated into five groups so that we do not have to score all suppliers at once. Those groups of suppliers are scored every three years. Round 1 scoring of our five supplier groups was conducted from 2011 to mid-2014, and Round 2 scoring was conducted from mid-2014 through 2017. Round 3 sustainability scoring was completed with supplier group 1 (2017) and supplier groups 2 and 3 (2018). Round 3 scoring for supplier groups 4 and 5 is anticipated to be completed in 2019 and 2020, respectively.

Our primary goal in scoring our suppliers is to monitor their sustainability performance and increase spend by five percent every scoring round with suppliers that fall within the acceptable sustainability scoring range of A, B and C. After each sustainability scoring round, the Green Procurement Group Lead and the Corporate Sustainability team engage with suppliers that fell short of an acceptable sustainability score and suggest potential improvements.

| <i>Supplier Sustainability Scoring</i> | | | |
|---|--|---|--|
| 34% | 28% | 7% | 3% |
| Of spend screened every three years for environmental sustainability as of 2018 (includes 34 suppliers) | Increase in spend dollars with suppliers with a score of A through C (2018 vs. 2017) | Increase in average score of suppliers in groups 1-5 (Round 2 vs. Round 1)* | Decrease in average score of suppliers in groups 1-3 (Round 3 vs. Round 2)** |

* Metrics based on comparison of completed Round 2 to Round 1 (supplier groups 1-5) at YE 2016.

** Metrics based on comparison of Round 3 to Round 2 (supplier groups 1-3) at YE 2018.

In 2018, our Green Purchasing Work Group targeted suppliers who scored below our acceptable scoring range in Round 2 to inform them of a low-cost training conducted by the International Society of Sustainability Professionals. These educational webinars cover making the sustainable business case for your organization, creating a sustainability vision and impacts assessment, developing metrics, reports, and long-term goals, and implementing sustainable management systems.

Project Sourcing Sustainability Review

We consider sustainability practices when selecting and evaluating potential suppliers during our rigorous, seven-step sourcing process. Our Sustainability Office reviews our bi-weekly Corporate Purchasing sourcing initiative status reports. This allows the Sustainability Office to review purchasing projects early in the process to determine which projects will need to be scored for sustainability based on potential project environmental impacts. If we determine that Request for Proposal (RFP) scoring is required for a specific sourcing project, then we ask suppliers to respond to questions about the sustainability impacts of the services that

they will be offering and provide information about the sustainability of their operations as a whole. When RFP sustainability scoring is deemed appropriate, the Sustainability section of the RFP accounts for 5 percent of the overall RFP score. Even if RFP scoring is not deemed necessary, our Sustainability team will generally engage with our project sourcing team a few times per year to make recommendations and requests related to sustainable attributes of products and services.

While we review real estate-related projects for potential sustainability impacts, we do not score those projects for sustainability given the significant number of small real estate projects and suppliers. Instead, we embed sustainability-related criteria into the larger real estate projects, and when feasible, we incorporate sustainable product attributes into real estate RFPs. Additionally, our Corporate Real Estate Department asks key real estate suppliers to discuss their sustainability progress during regularly scheduled business reviews to help drive performance. This progress is shared with the real estate sustainability working group monthly.

For additional details on our Supply Chain sustainability progress, refer to our most recent [CDP Response](#).

Environmentally Responsible Procurement

Buying environmentally preferable products (EPP) helps reduce our operations' impact on natural resources. Our Green Procurement Work Group oversees our EPP program, which covers common purchases ranging from furniture and carpeting to computer equipment and office supplies. The Work Group includes members of our Corporate Purchasing, Marketing and Sustainability departments, as well as key supplier partners. Our Work Group provides colleagues with best practices related to EPP and purchasing managers with tools to help increase the purchase of environmentally preferred products where possible.

Where feasible, we try to incorporate environmental attributes into our key products purchased. We work with several key suppliers to quantify the annual environmental impacts of our purchases, particularly across the following focus areas:

- Recycled content, NSF 140 rating, and Cradle-to-Cradle certification of the carpet products,
- Quantity of computer purchases that meet the IEEE Electronic Product Environmental Assessment Tool (EPEAT) ratings (considering the entire lifecycle of the computer),
- Quantity of furniture purchases that received the Business and Institutional Furniture Sustainability Standard (BIFMA) level® certification (considering materials used, energy and climate impact, human and ecosystem impacts, and social responsibility), and
- Recycled content of office supplies purchased, including office copy paper. (For more details on paper performance, see [Environmental Resource Management](#).)

2018 EPP Performance

| Carpeting | Computers | Furniture | Office Supplies | |
|---|--|--|--|---|
| 100% of carpet purchases were NSF 140 Gold rated and Cradle-to-Cradle silver certified. 97 percent of carpet purchases contained recycled content | 91% of computers and displays purchased carried the EPEAT Gold rating and 100 percent were Energy Star certified | 90% of furniture purchases were BIFMA level® certified | 21% of office supplies purchased from Office Depot contained post-consumer recycled content (primarily related to paper purchases) | 36% of office supplies purchased from Office Depot were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System |

Engaging Our Communities on Sustainability

Where possible, Comerica's Sustainability Office looks to impart our sustainability expertise to help other organizations to reduce their environmental impacts. We also support external environmental and sustainability organizations through board participation, sponsorships, and as speakers at events within our communities.

Comerica's Support of Great Lakes Women's Business Council

Comerica partners with the Great Lakes Women's Business Council to host quarterly Michigan Women's Marketplace webinars for women-business owners. Comerica hosted a November 2018 Michigan Women's Marketplace webinar on the topic of helping small and medium-size enterprises start on their sustainability journey. Topics included: where best to start on the sustainability journey, how to identify key risks and opportunities, how to develop the business case for sustainability, establishing an appropriate sustainability strategy, measuring on the organization's progress, setting relevant goals and telling your sustainability story. Comerica used our sustainability progress as examples through the presentation.

Comerica supports the Environmental Research and Education Foundation (EREF), a non-lobbying, nonprofit research foundation focused on waste management initiatives. EREF works to provide unbiased, scientific research and analysis, undergraduate student scholarships, and educational programs on waste management practices.

Supporting Waste Management Research and Education

Comerica is a co-sponsor of the School Cafeteria Discards Assessment Project (SCrAP). Developed by EREF — in collaboration with the School Nutrition Foundation and Keep America Beautiful — the project works to quantify both food and other waste in cafeterias at K-12 schools nationally. The project aims to gather information regarding the quantity of waste generated in school cafeterias and understand how this waste is managed both at the school and after it is hauled away.

Reducing food waste is an important step for fighting hunger, decreasing greenhouse gas emissions, sustainable use of natural resources, and reducing food waste cost. The issue of food waste is a global concern and the amount of annual food waste produced by the U.S. is one of the highest in the world.

"Our role in providing a more sustainable planet begins with collaboration on issues such as food waste. We value our role with EREF in providing SCrAP with support thorough leadership, expertise, business experience and financial support to positively impact our communities and people around the globe for generations to come."

-Joe Ursuy, Senior Vice President Environmental Services Department, Comerica Bank

COMMUNITY

The health of the communities we serve is vital to our growth and economic development in these communities is a central pillar of our mission. Our ongoing vision to assist entrepreneurs in starting and managing their businesses has been realized through initiatives, such as our MicroEnterprise Loan Funds, Technical Assistance Providers, CRA lending, affordable housing tax credit investments and new market tax credit programs. Additionally, we partner, volunteer with and donate to nonprofit organizations in the communities where we operate to maximize our positive impact.

| | |
|------------------------|--|
| 2018 PROGRESS | Supported small businesses through funding of 28 MicroEnterprise Loan Funds |
| | Completed transactions (closed) for \$75 million in Low-Income Housing Tax Credit investments |
| | Contributed more than \$7.8 million to charitable organizations via more than 1,500 grants/sponsorships |
| | Recognized by the Points of Light Foundation for our corporate citizenship practices as part of the Civic 50, one of the 50 most community-minded companies |
| 2018 CHALLENGES | Improving our recording processes to ensure we capture all volunteer hours colleagues undertake within our communities |
| | Competing with other companies in the financial services industry to identify tax credit investments that meet our underwriting standards and are located in areas we believe would most benefit from our investment |

We highlight our commitment to community with Comerica's signature Shred Day events. These events embody our approach to triple bottom line impact:

- we support our communities by helping individuals and small businesses prevent identity theft and fraud,
- keep resources in use while keeping waste out of landfills, and
- help support the most vulnerable members of our communities.

Comerica Shred Days Support Privacy, Recycling and Food Banks

Comerica's Shred Days involve collecting paper records and sensitive documents, shredding them securely, as well as collecting food and donations. We reduce fraud and identify theft, recycle hundreds of tons of paper, and help address hunger in our communities. Our highly visible and successful events provide us an opportunity to enhance our brand awareness, educate the public, and engage with our colleagues and the communities we serve.

Working with event partner Iron Mountain at Shred Day events in Dallas, Houston, Phoenix and Detroit, we securely destroyed and recycled more than 650,000 pounds of paper in 2018, while gathering donations for local food banks (over 18,000 pounds of food and over \$44,000 in donations providing the equivalent of approximately 196,000 meals). In 2018, we again partnered with Resource Partners to support electronic waste recycling in the Detroit event, bringing over 4,000 pounds of electronics for recycling. Since 2011, we have securely shredded approximately 4.4 million pounds of paper and organized the donation of the equivalent of over 975,000 meals to local food banks.

Comerica Shred Days Support Privacy, Recycling and Food Banks



"We take great pride in investing into the communities we serve, and Shred Day gives us the opportunity to provide financial education, protect consumers from fraud, improve the environment and help those in need."

- Mike Ritchie, President Michigan Market, Comerica Bank



Community Investment & Development

Impact Topic

Vibrant and thriving communities help us succeed and 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 our small business and community development lending program, investing in tax credits for affordable housing and providing financial education.

Community Reinvestment Act

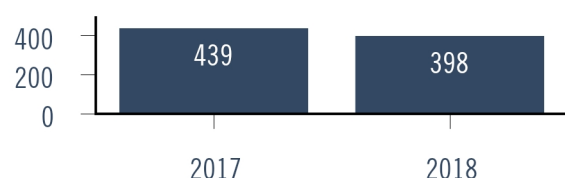
The Community Reinvestment Act (CRA) of 1977 is a regulation that encourages financial institutions to address the needs of their entire communities, including those in low- and moderate-income (LMI) areas. We have a dedicated team of seven External Affairs market managers who are responsible for working with our community partners to support the needs of the markets where we operate. These market managers also identify opportunities where Comerica can support community projects and provide targeted products and services. We also have a CRA Compliance team that works closely with External Affairs to measure and consistently improve performance. A CRA Working Group of senior leaders ensures that established goals and benchmarks are met.

The bank's community development strategy is a collaborative effort between the External Affairs team, the CRA Compliance team and the CRA Working Group. Recommendations are made based on feedback received from our Community Development Advisory Councils, other trusted community partners, research related to current market conditions, and the results of the most recent CRA examination.

We require new CRA compliance staff to take our in-house CRA training. We also participate in peer bank meetings across our markets to benchmark our performance and share best practices in complying with CRA regulations to achieve the greatest possible impact in our community development efforts.

Comerica seeks out investments in affordable housing and other social services, including day care facilities. We also offer products that benefit LMI individuals, including our Access Checking, On the Job Banking, Secured Credit Card and Direct Express accounts. For more information on products and services that support LMI individuals, see [Financial Inclusion & Financial Literacy](#).

Community Development Loans (\$ Millions)



In 2018, Comerica originated 97 Community Development loans totaling approximately \$398 million, compared with \$439 million in 2017. Community Development Lending activity is largely dependent on market conditions and available opportunities. 2017 was a record year for natural disasters in several of our major markets (Texas and California), which contributed to an increase in community development opportunities. For information since 2012, review the [Key Statistics Table](#).

Comerica received a "Satisfactory" rating in our most recent CRA examination, which covered the 2015-2017 period. This rating - not the "Outstanding" rating we strive for - was influenced by:

- Challenges in 2015-2017 with lending performance in most markets, with the exception of Texas. The impact on Comerica's CRA rating is reflective of the economic and regulatory environment, as well as staffing changes, particularly in Arizona, California and Florida. Several initiatives are being developed that are expected to improve performance in 2019. We expanded our strategies to ensure we provide sufficient CRA-related outreach, including financial education, across our 25 CRA assessment areas. In addition, we continued to seek expert insights from our Community Development Advisory Councils in Michigan, California and Texas on how our products and services can best support LMI communities. Each council is made up of seven to eight key community partners from local nonprofit organizations that represent the diverse populations and interests in our markets.
- Diversification of the bank's community development investments. Comerica's CRA investment strategy has historically been heavily focused on investments in affordable housing, such as low-income housing tax credits. The bank's most recent performance evaluation identified opportunities to diversify this activity into other vehicles. Future investments will continue to include low-income housing tax credits but will likely include others that are more focused on supporting Community Development Financial Institutions (CDFI) and small business lending. "Signature" programs like Comerica's Community Resource Centers, Comerica Money and Business \$ense programs, as well as supporting organizations that provide small business technical assistance, also will be a priority.

Community Reinvestment Recognition and Awards

2018 Community Advocate Award from *This Woman's Work*, a Texas-based nonprofit, was awarded to Comerica's Texas External Affairs team for their commitment to the community.

2018 Financial Capabilities Innovation Award from EVERFi, the leading national technology-based financial education provider, was awarded in recognition of Comerica's exceptional efforts to improve the financial capabilities of people within our communities.

Supporting Small Businesses through MicroEnterprise Loan Funds

To support the small businesses and entrepreneurs that make up the backbone of local economies, Comerica provides loan capital to microenterprise loan funds where we operate. We also look for opportunities to fund organizations that provide technical assistance and financial education to small business. For more information on how Comerica supports financial education, see the [Financial Literacy](#) and [Customer Education](#) sections of this report.

Investing in Neighborhood Revitalization

Comerica has always served the needs of the communities in which we operate. There is no better example of this than its investments in tax credit-financed real estate. Through this activity, 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.

All of our tax credit investments must be qualified for CRA credit. Furthermore, our tax credit investing enables us to direct financial resources to the communities where we have the strongest connections and in ways that have the greatest social impact. Our investments help create housing developments with targeted tenancy such as people at the lowest income ranges, residents with special needs, military service veterans and senior members in our markets. Additionally, some investment activity is used to preserve affordability in locations experiencing increases in rental rates.

Our investment actions help achieve positive social impacts for communities that goes beyond typical financing activities. Comerica's investments in qualified tax credit developments help create stable communities and support families with high-quality affordable housing alternatives.

In 2018, we approved \$75 million (with \$71 million completed/closed) in low-income housing tax credit investments to support neighborhoods within our key markets of Texas, Arizona, California, Florida and Michigan. While this was a slight decrease from 2017, it was in line with our annual investment target of \$75 million. We are proud of our performance given strong competition within the financial services industry and recent changes to the federal tax code which has made it more challenging to find tax credit investments that meet our underwriting standards and are located in areas we believe would most benefit from our investment. More than six percent of the projects that benefited from Comerica's tax credit investments in 2018 are Leadership in Energy and Environmental Design (LEED) certified housing projects.

Volunteerism & Philanthropy

Impact Topic

At Comerica, our Core Values help guide our actions so we are able to have the greatest impact. Involvement is a core value of Comerica's because we recognize that our success is intertwined with the prosperity of the communities we serve with our time, expertise and resources.

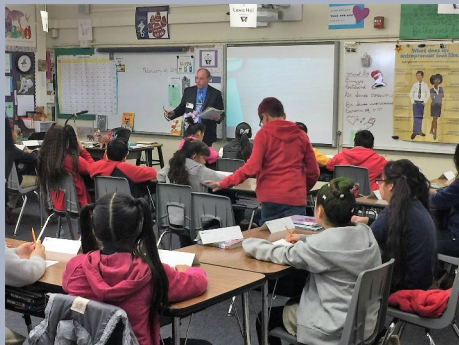
Volunteerism

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 literacy training and providing services requested by local community groups to help make them better places.

We strive to be a leader in giving back to our communities through our colleagues' volunteering and board participation in our key markets. To achieve this, each primary market has a Local Community Involvement Coordinator, who works with our National Employee Volunteer Program Manager to ensure that volunteering goals are met and that we follow best practice in delivering these commitments. In each of our markets, we set annual goals for volunteer hours and managers are requested to lead by example and encourage other colleagues to contribute their time.

Comerica Volunteers In Our Communities

Comerica partnered with Junior Achievement to provide financial education to more than 400 elementary school students at Adams Elementary School in Santa Ana, California in February 2018. 17 Comerica colleagues from our Orange County Retail and Business Banking teams volunteered for the event.



Comerica colleagues rallied to help impact the lives of Detroit, Michigan youth. Volunteers joined local partners to help revitalize the Boys & Girls Club - Lloyd H. Diehl Club's clubhouse. From painting to constructing a reading loft, our volunteers rolled up their sleeves to create a welcoming environment.



Comerica's Beverly Hills Banking Center Assistant Manager partnered with the Hermandad Mexicana Nacional and taught a first-time home buyer and mortgage workshop to over 150 Latinos in Spanish for five Saturday sessions in March and April 2018. Hermandad Mexicana is a nonprofit, non-governmental, community-based organization of members and families of Latino immigrant workers and those who sympathize with the onerous restrictions society places on Latino immigrants and their families.

Since 2011, our Donate 8 initiative has challenged colleagues to spend eight hours or more of personal time per year on community service activities. To encourage colleagues to record their community volunteer hours, we updated the program in 2014 to provide incentives for participation. In 2018, colleagues who recorded eight hours or more at the end of the year were entered into a drawing to win a gift card, and those who recorded over 100 hours received signed certificates of appreciation from their respective market presidents. Sharing our expertise in addition to our time is an important aspect of our approach to volunteerism, so in addition to Donate 8, we also encourage senior managers to participate on community nonprofit boards.

2018 Comerica Employee Volunteering Numbers

51,697

Hours

1,850

Volunteers

\$1.27 million

Approximate worth of employee volunteer time

In 2018, our company-wide goal was to achieve 64,000 employee volunteer hours — equivalent to eight hours per employee. Approximately 23 percent of our colleagues recorded volunteer hours in 2018.

Comerica's long-standing commitment to volunteerism was recognized including our focus on leadership in volunteerism outreach and program efforts.

Our Recognition

The Civic 50 is an initiative of Points of Light, the world's largest organization dedicated to volunteer service. Each year the organization identifies 50 of the most community-minded companies in the United States. The award sets a national standard for superior corporate citizenship and showcases how companies can use their time, skills and other resources to improve the quality of life in the communities where they do business. Comerica has been listed on the Civic 50 for four consecutive years.

Photo to right: Patricia McCann, Comerica's Sr. Diversity Consultant, Social Impact Practices, with Neal Bush, Chairman of Points of Light Board of Directors.



Review the [Employee Engagement](#) section for more details on how we engage our colleagues.

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.

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 LMI individuals and families in a manner that aligns with our overall business approach and supports our strategic direction as a financial services provider.

Giving Priorities

| <i>Education</i> | <i>Economic/Community Development</i> | <i>Human Service</i> |
|--|--|---|
| Organizations that deliver financial literacy or education programs to low- and moderate-income children and adults. We also support scholarship programs for deserving students studying business, finance and STEM subjects. | Organizations that promote and enhance opportunities for low- and moderate-income families and communities, with a focus on programs that help deliver: economic self-sufficiency; job creation, training, readiness and retention; neighborhood/community revitalization and business development; and affordable housing advocacy and development. | Programs that enhance and protect the health and well-being of LMI individuals and families, in particular those that focus on transitional and supportive services and housing and those that feed the hungry. |

In line with our geographic footprint, we take advantage of opportunities to support communities in our key markets — Texas, Arizona, California, Florida and Michigan. Each market is allocated monies to contribute to the causes of nonprofit organizations that align with our giving priorities. We utilize disciplined processes and policies to ensure charitable requests are considered fairly and align with our giving priorities. Each Market President and Market Contributions Manager meet regularly to review grant requests and confirm adherence to our charitable policies and procedures. Comerica Bank's contributions budget is reviewed and approved by the Executive Steering Committee, which is made up of company leaders. Our Corporate Contributions Department undergoes an extensive internal audit every three years to ensure its activities align with our policies and procedures. For more information, visit [Comerica charitable giving](#) on Comerica.com.

Comerica's Money \$ense Program

Financial education continues to be a cornerstone of our efforts in helping to build and support stronger communities. Each year, we're pleased to serve students, adults and business owners by providing opportunities for financial education. In 2018, Comerica led and taught over 800 financial education events across our key markets of Texas, Michigan, California, Arizona and Florida. Through our Comerica Money \$ense Program, hundreds of low- and moderate- income students learned the tenets of being good stewards of their finances.

Comerica partners with EverFi to provide the Money \$ense financial education curriculum, which is designed to empower students with the essential skills needed to make sound financial decisions.

We remain committed to providing students with the skills and knowledge needed to successfully navigate the increasingly complex financial world we live in.

Comerica's Money \$ense Program



Enthusiastic students and parents in the Dallas area participate in a financial education workshop before receiving backpacks filled with school supplies donated by Comerica.



Florida-area students in Green Acres discuss savings while holding up piggy banks they received during Comerica's Money \$ense program in 2018.

In 2018, Comerica provided financial support of approximately \$7.8 million to charitable organizations via more than 1,500 grants and sponsorships. The largest recipient in 2018 was the corporate-wide United Way campaign, which received nearly \$1.7 million in funding from Comerica colleagues. Additional highlights include:

- \$400,000 awarded over the past eight years to winners of Hatch Detroit. Through 2018, Comerica has promoted brick and mortar business growth through the business pitch program.
- \$100,000 to the Greenlining Institute to support its Economic Summit, which brings together business and government leaders with the leadership of LMI communities to build relationships and create viable solutions to issues facing California and the nation.

Supporting our Colleagues and Communities in the Face of Wildfires

13 Comerica colleagues were forced to evacuate their homes due to the 2018 wildfires in California. While 11 colleagues were able to safely return to their homes, two were significantly affected, personalizing the impacts of increased severe weather events. Following the devastating fires, Comerica donated \$25,000 to the American Red Cross to assist with disaster relief efforts in California. *"We appreciate Comerica's support of the American Red Cross,"* said Gary Strong, Chief Executive Officer of the Gold Country Region of the American Red Cross. *"This donation allows us to continue to provide care and comfort to so many people directly impacted by these devastating fires across California."*

"Our hearts go out to those who have lost their loved ones, homes and businesses. We understand the overwhelming challenges so many Californians are facing, and we're committed to serving them during this difficult time."

- Morgan Rector, President California Market, Comerica Bank



ADDITIONAL INFORMATION

Key Statistics Table

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

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|--|--------|--------|--------|--------|--------|--------|--------|
| ECONOMIC IMPACTS | | | | | | | |
| Gross revenue (Millions \$) ¹ | 2,598 | 2,554 | 2,512 | 2,724 | 2,848 | 3,168 | 3,328 |
| Market capitalization at year end (Millions \$) ² | 5,712 | 8,667 | 8,385 | 7,350 | 11,941 | 15,006 | 10,996 |
| Common and preferred stock dividends (Millions \$) | 106 | 126 | 143 | 148 | 154 | 193 | 309 |
| Taxes (Millions \$) | 98 | 283 | 165 | 318 | 254 | 426 | 285 |
| Employee compensation and benefits (Millions \$) ³ | 1,018 | 1,009 | 972 | 1,000 | 989 | 961 | 1,009 |
| Goods and services purchased (Millions \$) ¹ | 724 | 695 | 617 | 800 | 959 | 885 | 776 |
| Total loans at year end (Millions \$) | 46,057 | 45,470 | 48,593 | 49,084 | 49,088 | 49,173 | 50,163 |
| SOCIAL IMPACTS | | | | | | | |
| Market Presence | | | | | | | |
| Number of ATMs | 640 | 635 | 639 | 637 | 606 | 589 | 584 |
| Number of U.S. banking centers | 488 | 482 | 480 | 476 | 457 | 437 | 435 |
| Community Development | | | | | | | |
| Community and economic development loans (Millions \$) | 174 | 512 | 354 | 342 | 380 | 439 | 398 |
| Low-income housing tax credit investment deals closed (Millions \$) | 69 | 74 | 74 | 78 | 75 | 75 | 71 |
| Historic rehabilitation tax credit investment (Millions \$) | 1.2 | 6.5 | 0 | 2 | 0 | 0 | 0 |
| Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent) | N/A | N/A | 10 | 7 | 6 | 6 | 7 |
| Number of micro-enterprise loan funds supported | 29 | 25 | 29 | 27 | 29 | 29 | 28 |
| Supplier diversity spend (Millions \$) | 70 | 70 | 67 | 110 | 102 | 64 | 65 |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|---|---------|---------|---------|---------|---------|---------|---------|
| ENVIRONMENTALLY BENEFICIAL LENDING | | | | | | | |
| Environmentally-Beneficial Loans | | | | | | | |
| Loan commitments (Millions \$) | 1,043 | 780 | 975 | 919 | 888 | 832 | 772 |
| Loan commitments (number of companies) | 127 | 101 | 105 | 116 | 95 | 78 | 75 |
| ENVIRONMENT-OPERATIONS | | | | | | | |
| Energy Use (MWh) | | | | | | | |
| Total direct and indirect energy use- real estate and transport (MWh) | 153,210 | 149,742 | 146,939 | 143,394 | 130,304 | 122,319 | 114,822 |
| Total direct and indirect energy use- real estate and transport (Billion Joules) | 551,556 | 539,071 | 528,980 | 516,218 | 469,094 | 440,348 | 413,359 |
| Total direct and indirect energy use- real estate only (MWh) ⁴ | 148,266 | 144,783 | 143,015 | 139,405 | 126,715 | 118,641 | 111,469 |
| Direct energy use- fossil fuels (MWh) | 30,966 | 38,939 | 42,891 | 33,672 | 28,725 | 27,509 | 28,525 |
| Indirect energy use- purchased electricity, steam, chilled water in metered buildings (MWh) | 93,779 | 85,505 | 80,163 | 77,514 | 71,993 | 67,222 | 60,876 |
| Indirect energy use- estimated electricity use in leased (and unmetered) buildings (MWh) | 28,465 | 25,298 | 23,885 | 28,219 | 25,997 | 19,277 | 16,518 |
| Energy Intensity | | | | | | | |
| Total direct and indirect energy use- real estate ⁴ (MWh) per square foot at year end | 0.0267 | 0.0267 | 0.0267 | 0.0269 | 0.0255 | 0.0250 | 0.0253 |
| Total direct and indirect energy use- real estate ⁴ (MWh) per square foot - average square feet over four quarters | N/A | 0.0265 | 0.0265 | 0.0263 | 0.0250 | 0.0243 | 0.0245 |
| Total direct and indirect energy use (MWh) per full time employee (FTE) | N/A | N/A | N/A | 16.21 | 16.53 | 15.32 | 14.74 |
| Scopes 1 and 2 GHG Emissions (Metric tons of CO ₂ e)- Real Estate and Transport ⁵ | | | | | | | |
| Total GHG Emissions from Real Estate (Scopes 1 and 2) and Travel (Scope 1) | 81,735 | 75,839 | 73,200 | 68,603 | 63,332 | 58,121 | 46,287 |
| Breakdown by Activity | | | | | | | |
| GHG emissions- Scopes 1 and 2 real estate only | 80,533 | 74,635 | 72,247 | 67,636 | 62,461 | 57,229 | 45,477 |
| Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end) within organization | 0.0145 | 0.0138 | 0.0135 | 0.0131 | 0.0126 | 0.0120 | 0.0103 |
| Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters) within organization | N/A | 0.0137 | 0.0134 | 0.0128 | 0.0123 | 0.0117 | 0.0100 |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|---|--------|--------|--------|--------|--------|--------|--------|
| Percent Cumulative reduction from 2012 base year (Goal= 20 percent GHG reduction from base year by 2020) | N/A | 7.2 | 10.3 | 16.0 | 22.4 | 28.9 | 43.5 |
| GHG emissions- Scope 1 transport only | 1,201 | 1,204 | 953 | 967 | 870 | 892 | 810 |
| Breakdown by Scope | | | | | | | |
| Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants | 6,950 | 8,019 | 8,523 | 7,638 | 6,608 | 6,492 | 6,371 |
| Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings | 74,784 | 67,820 | 64,677 | 60,965 | 56,723 | 51,629 | 39,916 |
| Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport ⁵ | | | | | | | |
| Purchased Goods and Services | | | | | | | |
| Total lifecycle paper emissions ⁶ | 3,055 | 2,873 | 2,511 | 2,152 | 1,797 | 5,340 | 5,257 |
| Life cycle emissions associated with office copy paper use ⁶ | 1,270 | 1,136 | 1,030 | 933 | 836 | 2,036 | 1,964 |
| Life cycle emissions associated with other office paper use ⁶ | 1,563 | 1,558 | 1,262 | 1,050 | 811 | 3,010 | 2,930 |
| Life cycle emissions associated with marketing paper use ⁶ | 222 | 178 | 219 | 170 | 151 | 294 | 364 |
| Total lifecycle computer emissions | 520 | 57 | 202 | 193 | 1,389 | 1,317 | 3,031 |
| Total lifecycle carpeting emissions | 137 | 168 | 125 | 287 | 271 | 541 | 289 |
| Capital Goods | | | | | | | |
| Total lifecycle furniture emissions | N/A | 463 | 148 | 425 | 303 | 268 | 1,283 |
| Fuel-and-energy related activities | | | | | | | |
| Electricity transmission/distribution loss emissions | N/A | 4,442 | 4,302 | 5,441 | 5,095 | 2,671 | 1,868 |
| Upstream Transportation and Distribution | | | | | | | |
| Shipping emissions | N/A | 572 | 404 | 234 | 196 | 113 | 133 |
| Armored vehicle emissions | N/A | 967 | 635 | 640 | 981 | 613 | 59 |
| Waste Generated in Operations | | | | | | | |
| Scope 3 lifecycle emissions associated with landfilled mixed solid waste | 2,052 | 2,033 | 914 | 765 | 521 | 573 | 514 |
| Business Travel | | | | | | | |
| Employee business travel by air and car | 4,431 | 4,791 | 4,147 | 4,174 | 3,426 | 3,431 | 3,453 |
| Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE) | N/A | N/A | N/A | 0.47 | 0.43 | 0.43 | 0.44 |
| Employee Commuting | | | | | | | |
| Employee commuting emissions | N/A | 35,864 | 33,200 | 33,061 | 29,327 | 29,278 | 25,544 |
| Downstream Leased Assets | | | | | | | |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <i>Total subleased emissions</i> | 1,257 | 1,508 | 2,141 | 1,934 | 1,606 | 1,470 | 1,027 |
| Subleased metered electricity | 726 | 665 | 629 | 484 | 371 | 321 | 261 |
| Subleased estimated electricity | 423 | 715 | 1,107 | 1,120 | 976 | 1,022 | 560 |
| Subleased natural gas | 81 | 106 | 108 | 76 | 37 | 23 | 25 |
| Subleased steam | 28 | 22 | 25 | 8 | — | — | — |
| Subleased estimated heat-natural gas | N/A | N/A | N/A | N/A | 5 | 5 | 6 |
| Subleased corporate jet emissions | N/A | N/A | 272 | 246 | 217 | 100 | 175 |
| Other Downstream | | | | | | | |
| CBRE Business Travel on Comerica Account | N/A | N/A | N/A | 253 | 278 | 203 | 181 |
| Real Estate Square Footage (Square feet at year end) | | | | | | | |
| Total metered and unmetered square feet at year end | 5,545,466 | 5,422,833 | 5,349,936 | 5,183,634 | 4,963,357 | 4,749,329 | 4,401,337 |
| Total subleased square feet at year end | 137,637 | 197,753 | 188,292 | 173,886 | 159,968 | 156,882 | 51,522 |
| Real Estate Square Footage (Average square feet over four quarters) | | | | | | | |
| Average metered and unmetered square feet over four quarters | N/A | 5,464,632 | 5,398,441 | 5,291,828 | 5,064,895 | 4,880,994 | 4,547,160 |
| Average subleased square feet over four quarters | N/A | 159,866 | 193,282 | 181,384 | 163,331 | 156,611 | 115,654 |
| Waste Management (short tons) | | | | | | | |
| Landfilled employee waste | 2,086 | 2,067 | 1,732 | 1,583 | 1,501 | 1,650 | 1,480 |
| Percent Cumulative reduction from 2012 base year (Goal= 20 percent Landfilled Waste Reduction by 2020) | N/A | N/A | 16.9 | 24.1 | 28.0 | 20.9 | 29.1 |
| Total recycled/re-purposed waste | 3,372 | 2,990 | 2,915 | 2,917 | 2,584 | 2,244 | 2,376 |
| Recycled office paper | 3,108 | 2,680 | 2,684 | 2,676 | 2,248 | 2,025 | 2,148 |
| Recycled electronic equipment | 94 | 117 | 52 | 51 | 107 | 27 | 35 |
| Repurposed electronic equipment | 55 | 46 | 15 | 26 | 43 | 9 | 13 |
| Recycled operational waste | 110 | 141 | 154 | 153 | 166 | 166 | 156 |
| Recycled cardboard bailer waste | N/A | N/A | 7 | 7 | 8 | 8 | 6 |
| Universal waste | 3 | 5 | 3 | 4 | 8 | 4 | 12 |
| Recycled pallets | N/A | N/A | N/A | N/A | 5 | 5.8 | 4.9 |
| Total waste diverted from landfill (Percent) including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste | 62 | 59 | 63 | 65 | 63 | 58 | 62 |
| Water Use (cubic meters)⁷ | | | | | | | |
| Total water consumption (cubic meters) | 451,532 | 412,123 | 349,785 | 339,438 | 356,216 | 328,398 | 327,001 |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|---|-------|-------|-------|--------|--------|--------|--------|
| Intensity metric- Water consumption (cubic meters per Total Employee FTE) | N/A | N/A | N/A | 38.37 | 45.18 | 41.14 | 41.99 |
| Intensity metric- Water consumption (cubic meters per Total Worker FTE) | N/A | N/A | N/A | 35.04 | 40.76 | 37.19 | 37.32 |
| Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020) | N/A | N/A | 22.5 | 24.8 | 21.1 | 27.3 | 27.6 |
| Paper Use | | | | | | | |
| Total paper consumption (tons) | 1,266 | 1,173 | 1,039 | 894 | 750 | 707 | 695 |
| Office copy paper consumption (tons) | 560 | 487 | 454 | 410 | 368 | 299 | 289 |
| Other office paper consumption (tons) | 618 | 615 | 499 | 416 | 323 | 371 | 361 |
| Marketing paper consumption (tons) | 88 | 71 | 87 | 68 | 60 | 36 | 45 |
| Paper Intensity metrics (pounds consumed per FTE) | | | | | | | |
| Total office paper (office copy and other office paper) consumption in pounds per FTE | N/A | N/A | N/A | 186.73 | 175.18 | 167.97 | 166.88 |
| Office copy paper consumption in pounds per FTE | N/A | N/A | N/A | 92.69 | 93.34 | 74.99 | 74.12 |
| Percent Cumulative reduction from 2012 base year (Goal= 50 percent Office Copy Paper Reduction by 2020) | N/A | N/A | 18.9 | 26.7 | 34.3 | 46.6 | 48.5 |
| Environmental Attributes of Paper | | | | | | | |
| Total FSC-certified office paper (Percent of total) | 47 | 28 | 48 | 49 | 54 | 46 | 46 |
| Total FSC-certified marketing paper (Percent of total) | 64 | 90 | 80 | 99 | 100 | 99 | 98 |
| Office copy paper with at least 30 percent post-consumer recycled content (Percent of total office copy paper) | 97 | 74 | 96 | 95 | 95 | 96 | 95 |
| All other papers (excluding office copy paper) with at least 10 percent post-consumer recycled content (Percent of total papers except office copy paper) | 14 | 12 | 14 | 25 | 37 | 36 | 13 |
| Total post-consumer recycled content by weight (Percent of total paper consumption) | 14 | 13 | 10 | 15 | 16 | 14 | 13 |
| EMPLOYEES | | | | | | | |
| Number of Workers | | | | | | | |
| Total Employees- Full-time equivalents (FTE) ⁸ | 9,035 | 8,948 | 8,876 | 8,880 | 7,960 | 7,999 | 7,865 |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|--|---------|---------|---------|---------|---------|---------|---------|
| Intensity-based employee FTEs - used for intensity-based metrics ⁹ | N/A | N/A | N/A | 8,847 | 7,884 | 7,983 | 7,787 |
| Total Workers (including employees and contingent workers within our buildings, on FTE basis) ⁹ | N/A | N/A | N/A | 9,687 | 8,740 | 8,831 | 8,763 |
| Employee Diversity | | | | | | | |
| Women employees (Percent of total employees) | N/A | N/A | N/A | 67.1 | 67.3 | 66.5 | 66.0 |
| Women Officials and Managers (total number) ¹⁰ | N/A | N/A | N/A | 1,251 | 728 | 725 | 697 |
| Women Professionals (total number) ¹⁰ | N/A | N/A | N/A | 1,498 | 1,415 | 1,497 | 1,532 |
| Women Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰ | N/A | N/A | N/A | 3,341 | 3,298 | 3,198 | 3,089 |
| Racial/Ethnic Minority Population employees (Percent of total employees) | N/A | N/A | N/A | 38.5 | 38.2 | 39.1 | 40.1 |
| Racial/Ethnic Minority Officials and Managers (total number) ¹⁰ | N/A | N/A | N/A | 662 | 328 | 343 | 352 |
| Racial/Ethnic Minority Professionals (total number) ¹⁰ | N/A | N/A | N/A | 834 | 780 | 840 | 901 |
| Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰ | N/A | N/A | N/A | 1,996 | 1,979 | 2,007 | 1,976 |
| Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program (Percent) ¹¹ | N/A | N/A | 85 | 80 | 89 | 88 | 88 |
| Bronze-level certified colleagues (number of colleagues) | N/A | N/A | 5,028 | 5,345 | 5,167 | 5,301 | 5,122 |
| Silver-level certified colleagues (number of colleagues) | N/A | N/A | 3,536 | 4,081 | 3,984 | 4,180 | 4,221 |
| Gold-level certified colleagues (number of colleagues) | N/A | N/A | 2,373 | 3,031 | 3,065 | 3,332 | 3,396 |
| Platinum-level certified colleagues (number of colleagues) | N/A | N/A | 1,237 | 1,555 | 1,688 | 1,961 | 2,021 |
| Employee Benefits | | | | | | | |
| Services provided through Comerica's Employee Assistance Program (# of instances) | N/A | 4,570 | 4,499 | 3,854 | 4,671 | 4,433 | 3,621 |
| Employees receiving tuition assistance (total number) | 132 | 248 | 226 | 212 | 179 | 143 | 131 |
| Value of tuition assistance received (\$) | 852,680 | 886,599 | 801,200 | 814,508 | 686,694 | 529,993 | 457,300 |
| Leadership Development Program (number of graduates) ¹² | 47 | 49 | 44 | 29 | 29 | — | 27 |

| KEY STATISTICS | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|--|---------|---------|---------|---------|---------|---------|---------|
| Emerging Leaders Program (number of graduates) ¹² | N/A | N/A | N/A | N/A | N/A | 47 | — |
| Employee Awards (number of monetary awards to employees) | 2,657 | 2,746 | 2,571 | 2,270 | 2,196 | 2,350 | 2,045 |
| Value of Employee Awards (\$) | 378,000 | 392,000 | 391,000 | 387,000 | 372,075 | 385,843 | 421,000 |
| COMMUNITY | | | | | | | |
| Charitable gifts and corporate contributions (Millions \$) | 9.1 | 8.4 | 8.8 | 8.8 | 8.1 | 8.0 | 7.8 |
| Employee United Way contributions (Millions \$) | 2.0 | 2.2 | 2.1 | 2.2 | 1.7 | 1.7 | 1.7 |
| Employee time volunteered (hours) | 71,000 | 72,186 | 73,970 | 73,800 | 59,350 | 67,967 | 51,697 |
| Number of employee volunteers | 2,300 | 2,514 | 2,543 | 2,853 | 2,286 | 2,039 | 1,850 |

¹ Gross revenue is comprised of net interest income and noninterest income.

² Source: S&P Global Market Intelligence.

³ Prior period amounts restated to reflect the adoption of Accounting Standard Update (ASU) 2017-07, "Compensation - Retirement Benefits (Topic 715): Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost," effective January 1, 2018. For further information, refer to Note 1 to the consolidated financial statements in Comerica's [2018 Annual Report](#).

⁴ 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.

⁵ Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its greenhouse gas (GHG) emissions. Specific methodologies for estimating all Scope 1, Scope 2, and Scope 3 emissions shown in the above table, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in Comerica's most recent [CDP Response](#).

⁶ Updated 2017 Paper Emissions using Environmental Paper Network Paper Calculator Version 4.0 (for comparison purposes to 2018), which resulted in 2017 emissions increasing by over 200 percent related specifically to the change in calculation methodology.

⁷ 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.

⁸ As reported in Comerica's [2018 Annual Report](#) (page F-109).

⁹ 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.

¹⁰ EEO-1 categories used for breakdown of Women and Racial/Ethnic Minority employee numbers.

¹¹ MDA level listings are cumulative. If a colleague has been certified at the Platinum level, he/she is also counted in the bronze, silver and gold certification level.

¹² Since 2016, Comerica's Leadership Development Program has been offered on a bi-annual basis (current program started 2018). Our new bi-annual Emerging Leaders Program began in Q4 2017 was completed in Q1 2018.

REPORTING METHODOLOGY

Comerica's 2018 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 sixth biennial GRI-based Corporate Responsibility (formerly Sustainability) Report. It covers our sustainability performance from January 1, 2018, to December 31, 2018 (fiscal year 2018). In some instances, 2017 or previous data is included for comparison, as our last comprehensive Sustainability Report was published in 2016. In limited instances, the report also references some projects and initiatives that stretched beyond 2018 and into 2019.

The Comerica Promise and our Core Values, presented in [Our Company](#), describe the way we engage with our colleagues, customers, and communities. They prescribe how we conduct business now and hereafter. By looking at sustainability through these two key lenses, we are able to focus on the most critical issues and provide greater transparency into our corporate cultural priorities. As in previous reports, we balance our data presentation by reporting on both the progress we have made and the challenges we face in key areas.

Impact Topics 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 work we conducted in 2014-2015 and follow-up engagements in 2016-2017 and 2019. These are explained in detail in [Stakeholder Engagement and ESG Impact Assessment](#) within the Our Company section. We have also mapped our Impact Topic groupings to the [United Nations 17 Sustainable Development Goals \(SDGs\)](#).

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2018 Comerica Incorporated Annual Report](#) (herein referred to as 2018 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2018. References to the "Board" refer to the Board of Directors of Comerica Incorporated.

Throughout this report, we use the terms "relevancy," "significance," and "impact" to refer to those topics that reflect the economic, environmental, social, and governance issues most important to Comerica and our stakeholders; what the GRI Sustainability Reporting 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. You will also find references to employees and colleagues interchangeably. Longer-term contract workers who are not considered employees/colleagues at Comerica are referenced as contingent workers within this report.

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](#) is provided at the end of the Additional Information section. Comerica will continue to monitor additional sustainability reporting guidelines for our future sustainability reporting efforts.

Comerica disclosed information on our diversity and inclusion performance to the office of U.S. House Financial Services Committee Chairwoman Maxine Waters on Wednesday, June 26, 2019, and U.S. House Financial Services Committee, Subcommittee on Diversity

and Inclusion, Chairwoman Joyce Beatty on Thursday, June 27, 2019. The information disclosed in that response varied slightly in format and content to the information presented in this report; however, there are no material differences in the information contained in that disclosure when compared to the content of this report.

GRI Standards Content Index - Core

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 Stakeholder Engagement and ESG Impact Assessment | | | |
| General Disclosures | | | |
| GRI 102: Organizational Profile | | | |
| 102-1 Name of the organization | Core | Comerica Inc. | — |
| 102-2 Activities, brands, products, and services | Core | Our Company | — |
| 102-3 Location of headquarters | Core | Comerica Corporate Headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201 | — |
| 102-4 Location of operations | Core | Our Company | — |
| 102-5 Ownership and legal form | Core | Our Company , 2018 Annual Report | — |
| 102-6 Markets served | Core | Our Company | — |
| 102-7 Scale of the organization | Core | Our Company , Employee Diversity and Inclusion , Key Statistics Table | — |
| 102-8 Information on employees and other workers | Core | Our Company , Colleagues , Diversity and Inclusion , Key Statistics Table The majority of work is performed by Comerica payroll employees. Non-employee contingent workers represent 16.6% 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 | Supply Chain , Supplier Diversity | — |
| 102-10 Significant changes to the organization and its supply chain | Core | Message from our CEO , Supply Chain , 2018 Annual Report | — |
| 102-11 Precautionary Principle or approach | Core | Business Risk Management | — |
| 102-12 External initiatives | Core | Comerica does not currently subscribe to or endorse externally developed charters or principles. | — |
| 102-13 Membership of associations | Core | Business Risk Management , Public Policy & Government Relations , Supplier Diversity , Community Investment and Development | — |

| GRI Standard Disclosure | Core vs Comprehensive | Link or Direct Comments | Omission |
|---|-----------------------|--|--------------------------|
| GRI 101: Foundation- see Stakeholder Engagement and ESG Impact Assessment | | | |
| Strategy | | | |
| 102-14 Statement from senior decision-maker | Core | Message from our CEO , Message from our Director of Corporate Sustainability | — |
| 102-15 Key impacts, risks, and opportunities | Comprehensive | Stakeholder Engagement and ESG Impact Assessment , Business Risk Management , 2019 CDP Response | — |
| Ethics and integrity | | | |
| 102-16 Values, principles, standards, and norms of behavior | Core | Our Company , Comerica Promise , Corporate Governance , Business Risk Management , Anti-Corruption , Ethics & Countering Bribery | — |
| 102-17 Mechanisms for advice and concerns about ethics | Comprehensive | Comerica Promise , Responsible Business , Corporate Governance , Business Risk Management , Anti-Corruption , Ethics & Countering Bribery , Colleagues , Corporate Governance Guidelines , Code of Business Conduct and Ethics for Employees | — |
| Governance | | | |
| 102-18 Governance structure | Core | Message from our CEO , Responsible Business , Corporate Governance , Corporate Governance Guidelines | — |
| 102-19 Delegating authority | Comprehensive | Message from our Director of Corporate Sustainability , Responsible Business , Business Risk Management , Colleagues , Diversity and Inclusion , Community | Disclosure partially met |
| 102-20 Executive-level responsibility for economic, environmental, and social topics | Comprehensive | Message from our Director of Corporate Responsibility , Responsible Business , Corporate Governance , Business Risk Management , Diversity and Inclusion , Community | Disclosure partially met |
| 102-21 Consulting stakeholders on economic, environmental, and social topics | Comprehensive | Stakeholder Engagement and ESG Impact Assessment | — |
| 102-22 Composition of the highest governance body and its committees | Comprehensive | Responsible Business , Corporate Governance , Proxy Statement , Corporate Governance Guidelines | — |
| 102-23 Chair of the highest governance body | Comprehensive | Message from our CEO , Proxy Statement | — |
| 102-24 Nominating and selecting the highest governance body | Comprehensive | Diversity and Inclusion , Board Diversity , Proxy Statement , Corporate Governance Guidelines | — |
| 102-25 Conflicts of interest | Comprehensive | Proxy Statement , Corporate Governance Guidelines | — |
| 102-26 Role of highest governance body in setting purpose, values, and strategy | Comprehensive | Proxy Statement | — |
| 102-27 Collective knowledge of highest governance body | Comprehensive | Proxy Statement | — |
| 102-28 Evaluating the highest governance body's performance | Comprehensive | Responsible Business , Corporate Governance , Proxy Statement | — |
| 102-29 Identifying and managing economic, environmental, and social impacts | Comprehensive | Responsible Business , Business Risk Management , Stakeholder Engagement and ESG Impact Assessment , 2019 CDP Response | — |
| 102-30 Effectiveness of risk management processes | Comprehensive | Responsible Business , Business Risk Management | — |

| GRI Standard Disclosure | Core vs Comprehensive | Link or Direct Comments | Omission |
|--|-----------------------|--|----------|
| GRI 101: Foundation- see Stakeholder Engagement and ESG Impact Assessment | | | |
| 102-31 Review of economic, environmental, and social topics | Comprehensive | Message from our CEO , Message from our Director of Corporate Sustainability , Stakeholder Engagement and ESG Impact Assessment , Corporate Governance , 2019 CDP Response | — |
| 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 | Business Risk Management , Employee Engagement | — |
| 102-34 Nature and total number of critical concerns | Comprehensive | — | — |
| 102-35 Remuneration policies | Comprehensive | Corporate Governance , Proxy Statement , Corporate Governance Guidelines | — |
| 102-36 Process for determining remuneration | Comprehensive | Corporate Governance , Proxy Statement , Corporate Governance Guidelines | — |
| 102-37 Stakeholders involvement in remuneration | Comprehensive | Corporate Governance , Proxy Statement , Corporate Governance Guidelines | — |
| 102-38 Annual total compensation ratio | Comprehensive | — | — |
| 102-39 Percentage increase in annual total compensation ratio | Comprehensive | — | — |
| Stakeholder engagement | | | |
| 102-40 List of stakeholder groups | Core | Message from our Director of Corporate Sustainability , Stakeholder Engagement and ESG Impact Assessment | — |
| 102-41 Collective bargaining agreements | Core | 0 percent of employees are covered by collective bargaining agreements | — |
| 102-42 Identifying and selecting stakeholders | Core | Stakeholder Engagement and ESG Impact Assessment | — |
| 102-43 Approach to stakeholder engagement | Core | Stakeholder Engagement and ESG Impact Assessment | — |
| 102-44 Key topics and concerns raised | Core | Stakeholder Engagement and ESG Impact Assessment | — |
| Reporting practice | | | |
| 102-45 Entities included in the consolidated financial statements | Core | 2018 Annual Report | — |
| 102-46 Defining report content and topic Boundaries | Core | Stakeholder Engagement and ESG Impact Assessment | — |
| 102-47 List of material topics | Core | Stakeholder Engagement and ESG Impact Assessment | — |
| 102-48 Restatements of information | Core | There were no material restatements of information provided in this report. | — |
| 102-49 Changes in reporting | Core | Message from our Director of Corporate Sustainability , Reporting Methodology | — |
| 102-50 Reporting period | Core | Reporting Methodology | — |
| 102-51 Date of most recent report | Core | Reporting Methodology | — |
| 102-52 Reporting cycle | Core | Reporting Methodology | — |
| 102-53 Contact point for questions regarding the report | Core | Message from the Director of Corporate Sustainability | — |
| 102-54 Claims of reporting in accordance with the GRI Standards | Core | Reporting Methodology | — |

| GRI Standard Disclosure | Core vs Comprehensive | Link or Direct Comments | Omission |
|---|-----------------------|-----------------------------------|----------|
| GRI 101: Foundation- see Stakeholder Engagement and ESG Impact Assessment | | | |
| 102-55 GRI content index | Core | This GRI Content Index | — |
| 102-56 External assurance | Core | 2019 CDP Response | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|------------------------------------|--|-------------------------|--|----------|
| Topic-Specific Disclosures | | | | |
| GRI 200 Economic Standard Series | | | | |
| Economic Performance | | No | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | No | Stakeholder Engagement and ESG Impact Assessment , Financial Performance | — |
| | 103-2 The management approach and its components | No | Financial Performance | — |
| | 103-3 Evaluation of the management approach | No | Financial Performance | — |
| GRI 201: Economic Performance | 201-1 Direct economic value generated and distributed | No | Economic Impacts , Financial Performance , Key Statistics Table | — |
| | 201-2 Financial implications and other risks and opportunities due to climate change | No | Business Risk Management , Managing Environmental Impacts of our Operations , Climate Change Impacts , Energy & Emissions , Environmentally Beneficial Lending , Environmental Risk Management , 2019 CDP Response | — |
| Market Presence | | No | | |
| Indirect Economic Impacts | | No | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | No | Stakeholder Engagement and ESG Impact Assessment , Economic Impacts | — |
| | 103-2 The management approach and its components | No | Economic Impacts , Financial Inclusion & Financial Literacy , Community Investment & Development , Volunteerism & Philanthropy | — |
| | 103-3 Evaluation of the management approach | No | Economic Impacts , Financial Inclusion & Financial Literacy , Community Investment & Development , Volunteerism & Philanthropy | — |
| GRI 203: Indirect Economic Impacts | 203-1 Infrastructure investments and services supported | No | Economic Impacts , Financial Inclusion & Financial Literacy , Community Investment & Development , Volunteerism & Philanthropy | — |
| | 203-2 Significant indirect economic impacts | No | Economic Impacts , Financial Inclusion & Financial Literacy , Community Investment & Development , Volunteerism & Philanthropy | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|--|---|-------------------------|--|----------|
| Procurement Practices | | No | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | No | Stakeholder Engagement and ESG Impact Assessment, Supply Chain | — |
| | 103-2 The management approach and its components | No | Supply Chain, Reducing Environmental Impacts in our Supply Chain | — |
| | 103-3 Evaluation of the management approach | No | Supply Chain, Reducing Environmental Impacts in our Supply Chain | — |
| GRI 204: Procurement Practices | 204-1 Proportion of spending on local suppliers | No | Supply Chain | — |
| Anti-corruption | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Anti-Corruption, Ethics & Countering Bribery | — |
| | 103-2 The management approach and its components | Yes | Anti-Corruption, Ethics & Countering Bribery | — |
| | 103-3 Evaluation of the management approach | Yes | Anti-Corruption, Ethics & Countering Bribery | — |
| GRI 205: Anti-corruption | 205-1 Operations assessed for risks related to corruption | Yes | Corporate Governance, Anti-Corruption, Ethics & Countering Bribery | — |
| | 205-2 Communication and training about anti-corruption policies and procedures | Yes | Anti-Corruption, Ethics & Countering Bribery | — |
| | 205-3 Confirmed incidents of corruption and actions taken | Yes | Anti-Corruption, Ethics & Countering Bribery | — |
| Anti-competitive Behavior | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Responsible Business | — |
| | 103-2 The management approach and its components | Yes | Anti-Corruption, Ethics & Countering Bribery, Responsible Business | — |
| | 103-3 Evaluation of the management approach | Yes | Anti-Corruption, Ethics & Countering Bribery, Responsible Business | — |
| GRI 206: Anti-competitive Behavior | 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices | Yes | Responsible Business | — |
| GRI 300 Environmental Standards Series | | | | |
| Materials | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Environmental Resource Management | — |
| | 103-2 The management approach and its components | Yes | Stakeholder Engagement and ESG Impact Assessment, Environmental Resource Management | — |
| | 103-3 Evaluation of the management approach | Yes | Stakeholder Engagement and ESG Impact Assessment, Environmental Resource Management | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|-----------------------------------|--|-------------------------|--|--|
| GRI 301: Materials | 301-1 Materials used by weight or volume | Yes | Environmental Resource Management, Key Statistics Table | — |
| | 301-2 Recycled input materials used | Yes | Environmental Resource Management, Key Statistics Table | — |
| | 301-3 Reclaimed products and their packaging materials | Yes | Environmental Resource Management, Key Statistics Table | — |
| Energy | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Energy & Emissions | — |
| | 103-2 The management approach and its components | Yes | Energy & Emissions | — |
| | 103-3 Evaluation of the management approach | Yes | Energy & Emissions | — |
| GRI 302: Energy | 302-1 Energy consumption within the organization | Yes | Energy & Emissions, Key Statistics Table, 2019 CDP Response | — |
| | 302-2 Energy consumption outside of the organization | Yes | Energy & Emissions, Key Statistics Table, 2019 CDP Response | — |
| | 302-3 Energy intensity | Yes | Energy & Emissions, Key Statistics Table, 2019 CDP Response | — |
| | 302-4 Reduction of energy consumption | Yes | Energy & Emissions, Key Statistics Table, 2019 CDP Response | — |
| | 302-5 Reductions in energy requirements of products and services | Yes | Energy & Emissions, Key Statistics Table, 2019 CDP Response | — |
| Water | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Water Stewardship | — |
| | 103-2 The management approach and its components | Yes | Water Stewardship | — |
| | 103-3 Evaluation of the management approach | Yes | Water Stewardship, Key Statistics Table | — |
| GRI 303: Water and Effluents 2018 | 303-1 Water withdrawal by source | Yes | Water Stewardship, Key Statistics Table | 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 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 | Stakeholder Engagement and ESG Impact Assessment , Energy & Emissions | — |
| | 103-2 The management approach and its components | Yes | Energy & Emissions | — |
| | 103-3 Evaluation of the management approach | Yes | Energy & Emissions | — |
| GRI 305: Emissions | 305-1 Direct (Scope 1) GHG emissions | Yes | Energy & Emissions , Key Statistics Table , 2019 CDP Response | — |
| | 305-2 Energy indirect (Scope 2) GHG emissions | Yes | Energy & Emissions , Key Statistics Table , 2019 CDP Response | — |
| | 305-3 Other indirect (Scope 3) GHG emissions | Yes | Energy & Emissions , Key Statistics Table , 2019 CDP Response | — |
| | 305-4 GHG emissions intensity | Yes | Energy & Emissions , Key Statistics Table , 2019 CDP Response | — |
| | 305-5 Reduction of GHG emissions | Yes | Energy & Emissions , Key Statistics Table , 2019 CDP Response | — |
| Effluents and Waste | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment , Environmental Resource Management | — |
| | 103-2 The management approach and its components | Yes | Environmental Resource Management | — |
| | 103-3 Evaluation of the management approach | Yes | Environmental Resource Management | — |
| GRI 306: Effluents and Waste | 306-2 Waste by type and disposal method | Yes | Environmental Resource Management , Key Statistics Table | — |
| Environmental Compliance | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment , Environmental Risk Management | — |
| | 103-2 The management approach and its components | Yes | Environmental Risk Management | — |
| | 103-3 Evaluation of the management approach | Yes | Environmental Risk Management | — |
| 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 2018 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 | Supply Chain , Reducing Environmental Impacts in our Supply Chain | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|--|--|-------------------------|---|----------|
| GRI 400 Social Standards Series | | | | |
| Employment | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Talent Attraction, Development & Retention, Employee Engagement | — |
| | 103-2 The management approach and its components | Yes | Talent Attraction, Development & Retention, Employee Engagement | — |
| | 103-3 Evaluation of the management approach | Yes | Talent Attraction, Development & Retention, Employee Engagement | — |
| GRI 401: Employment | 401-1 New employee hires and employee turnover | Yes | Talent Attraction, Development & Retention, Employee Engagement | — |
| | 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees | Yes | Talent Attraction, Development & Retention, Employee Engagement | — |
| Labor/Management Relations | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Colleagues | — |
| | 103-2 The management approach and its components | Yes | Colleagues | — |
| | 103-3 Evaluation of the management approach | Yes | Colleagues, Talent Attraction, Development & Retention | — |
| 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. | — |
| Occupational Health and Safety | | No | | |
| Training and Education | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Talent Attraction, Development & Retention | — |
| | 103-2 The management approach and its components | Yes | Talent Attraction, Development & Retention | — |
| | 103-3 Evaluation of the management approach | Yes | Talent Attraction, Development & Retention | — |
| GRI 404: Training and Education | 404-1 Average hours of training per year per employee | Yes | Talent Attraction, Development & Retention | — |
| | 404-2 Programs for upgrading employee skills and transition assistance programs | Yes | Talent Attraction, Development & Retention | — |
| | 404-3 Percentage of employees receiving regular performance and career development reviews | Yes | Talent Attraction, Development & Retention | — |

| 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 | Stakeholder Engagement and ESG Impact Assessment, Diversity & Inclusion, Corporate Governance | — |
| | 103-2 The management approach and its components | Yes | Corporate Governance, Diversity & Inclusion | — |
| | 103-3 Evaluation of the management approach | Yes | Corporate Governance, Diversity & Inclusion | — |
| GRI 405: Diversity and Equal Opportunity | 405-1 Diversity of governance bodies and employees | Yes | Corporate Governance, Employee Diversity and Inclusion, Board Diversity | — |
| | 405-2 Ratio of basic salary and remuneration of women to men | Yes | Diversity & Inclusion | 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 | Supply Chain, Anti-Corruption, Ethics & Countering Bribery | — |
| | 103-2 The management approach and its components | No | Supply Chain, Anti-Corruption, Ethics & Countering Bribery | — |
| | 103-3 Evaluation of the management approach | No | Supply Chain, Anti-Corruption, Ethics & Countering Bribery | — |
| GRI 412: Human Rights Assessment 2016 | 412-1 Operations that have been subject to human rights reviews or impact assessments | No | Supply Chain | — |
| | 412-2 Employee training on human rights policies or procedures | No | Anti-Corruption, Ethics & Countering Bribery | — |
| | 412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | No | Anti-Corruption, Ethics & Countering Bribery | — |
| Local Communities | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Community, Economic Impacts, Business Risk Management, Community Investment & Development, Volunteerism & Philanthropy | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|--------------------------------------|--|-------------------------|---|----------|
| GRI 413: Local Communities | 103-2 The management approach and its components | Yes | Economic Impacts, Business Risk Management, Community, Community Investment & Development, Volunteerism & Philanthropy | — |
| GRI 413: Local Communities | 103-3 Evaluation of the management approach | Yes | Economic Impacts, Business Risk Management, Community, Community Investment & Development, Volunteerism & Philanthropy | — |
| | 413-1 Operations with local community engagement, impact assessments, and development programs | Yes | Economic Impacts, Business Risk Management, Community, Community Investment & Development, Volunteerism & Philanthropy | — |
| Supplier Social Assessment | | No | | |
| Public Policy | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Public Policy & Government Relations | — |
| | 103-2 The management approach and its components | Yes | Public Policy & Government Relations | — |
| | 103-3 Evaluation of the management approach | Yes | Public Policy & Government Relations | — |
| GRI 415: Public Policy | 415-1 Political contributions | Yes | Public Policy & Government Relations | — |
| Customer Health & Safety | | No | | |
| Marketing and Labeling | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Responsible Business | — |
| | 103-2 The management approach and its components | Yes | Responsible Business | — |
| | 103-3 Evaluation of the management approach | Yes | Responsible Business | — |
| GRI 417: Marketing and Labeling 2016 | 417-1 Requirements for product and service information and labeling | Yes | Responsible Business | — |
| | 417-2 Incidents of non-compliance concerning product and service information and labeling | Yes | There were no significant fines in 2018 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 | Responsible Business | — |

| GRI Standard | Disclosure | Is this topic material? | Link or Direct Comments | Omission |
|-----------------------------------|--|-------------------------|---|----------|
| Customer Privacy | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Customers, Privacy & Information Protection | — |
| | 103-2 The management approach and its components | Yes | Privacy & Information Protection | — |
| | 103-3 Evaluation of the management approach | Yes | Privacy & Information Protection | — |
| GRI 418: Customer Privacy | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data | Yes | Privacy & Information Protection | — |
| Socioeconomic Compliance | | Yes | | |
| GRI 103: Management Approach | 103-1 Explanation of the material topic and its Boundary | Yes | Stakeholder Engagement and ESG Impact Assessment, Economic Impacts | — |
| | 103-2 The management approach and its components | Yes | Economic Impacts | — |
| | 103-3 Evaluation of the management approach | Yes | Economic Impacts | — |
| 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 2018 that would have a material adverse effect on our operations or ability to perform the services we offer. | — |

SASB Commercial Banks Standard Content Index

Throughout this report, we reference topics and metrics contained in the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for Commercial Banks. This particular standard is one of seven financial services standards published by SASB. While there are other 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.

We evaluated our current reporting content against the elements of SASB's Commercial Banks standard dated October 2019 (Version 2018-10). The table 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. Notes are also included to provide additional context around our disclosure.

| SASB Financials Sector Commercial Banking Standard Disclosures | | | | | |
|--|--------------|---|-----------------|---|---|
| SASB Topic | SASB Code | Accounting Metric | Disclosure Met? | Link or Direct Response | Comments |
| Data Security | FN-CB-230a.1 | (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected | Partially | Privacy & Information Protection | Metrics (2) and (3) not provided. |
| | FN-CB-230a.2 | Description of approach to identifying and addressing data security risks | Yes | Privacy & Information Protection | — |
| 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 | Community Investment & Development; Key Statistics Table | — |
| | 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 | 2018 Annual Report | 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 | Financial Inclusion & Financial Literacy | No-cost retail savings account provided; no-cost checking requires fee unless waived by direct deposit. |
| | FN-CB-240a.4 | Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers | Yes | Financial Inclusion & Financial Literacy | — |
| Incorporation of ESG Factors in Credit Analysis | FN-CB-410a.1 | Commercial and industrial credit exposure, by industry | Partially | 2018 Annual Report | 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 | ESG-Related Lending & Investment; Environmentally Beneficial Lending; Environmental Risk Management | — |

| SASB Financials Sector Commercial Banking Standard Disclosures | | | | | |
|--|--------------|---|-----------------|---|---|
| SASB Topic | SASB Code | Accounting Metric | Disclosure Met? | Link or Direct Response | Comments |
| Business Ethics | FN-CB-510a.1 | Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations | Yes | 2018 Annual Report | See Note 21 - Contingent Liabilities |
| | FN-CB-510a.2 | Description of whistleblower policies and procedures | Yes | Anti-Corruption, Ethics & Countering Bribery | — |
| Systemic Risk Management | FN-CB-550a.1 | Global Systemically Important Bank (G-SIB) score, by category | No | N/A | Not applicable as Comerica is not on G-SIB list |
| | FN-CB-550a.2 | Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities | Yes | Business Risk Management; Financial Performance; 2018 Annual Report | — |
| 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 | Financial Inclusion & Financial Literacy | (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 | 2018 Annual Report, Customers | — |