

GRI Standards Content Index: General Disclosures

Refer to the full [2020 Comerica Corporate Responsibility Report](#) for GRI Index links that connect back to the report sections.

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 Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 101: Foundation- see ESG Impact Assessment		
General Disclosures		
GRI 102: Organizational Profile		
102-1	Name of the organization	Comerica Inc.
102-2	Activities, brands, products, and services	Comerica.com , Our Company , 2020 Annual Report
102-3	Location of headquarters	Comerica Corporate Headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201
102-4	Location of operations	Our Company , 2020 Annual Report
102-5	Ownership and legal form	Our Company , 2020 Annual Report
102-6	Markets served	Comerica.com , Our Company , 2020 Annual Report
102-7	Scale of the organization	Our Company , 2020 Annual Report , Key Metrics-Colleagues

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 102: Organizational Profile (Continued)		
102-8	Information on employees and other workers	<p>Our Company, Key Metrics-Colleagues, Key Metrics Table (Diversity & Inclusion)</p> <p>The majority of work is performed by Comerica payrolled employees. Non-employee contingent workers represent 13.5% of our total workforce. There are no significant seasonal variations in employment. At Comerica, we track all contingent workers who access our systems by adding them to our human resource information system.</p> <p>OMISSION: Information unavailable for 102-8: Total number of supervised (contingent) workers by gender. We do not collect data by gender for our contingent workforce.</p>
102-9	Supply chain	<p>Key Metrics-Supplier Diversity, Key Metrics- Supplier Sustainability Engagement</p> <p>At Comerica, we engage with our supply chain and appropriately manage the risks and opportunities it presents. We endeavor to broaden our positive impacts on the environment and communities by influencing our suppliers and promoting a sustainable supply chain. We consider both supplier diversity and the environmental sustainability practices of suppliers during our rigorous sourcing process for selection and regular evaluation. Our Green Procurement Work Group looks to source suppliers and services that meet our environmental criteria where possible. In 2020, Comerica had over 3,000 active suppliers and an annual supplier spend of approximately \$700 million dollars, 67% of which is with our top 100 active suppliers. 51% of our supply base (by number of suppliers) and 29% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,029 suppliers in Michigan and 562 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.</p>
102-10	Significant changes to the organization and its supply chain	2020 Annual Report
102-11	Precautionary Principle or approach	Comerica's 2020 10-K (Item 1A-Risk Factors)
102-12	External initiatives	In 2020, Comerica signed the Partnership for Carbon Accounting Financials (PCAF) commitment to support the development of and to begin to report on our finance-related greenhouse gas emissions within three years. PCAF Commitment Letter
102-13	Membership of associations	Political Activities and Contributions , Supplier Diversity Program , 2021 CDP Response , Most Recent Diversity, Equity & Inclusion Progress Report , Comerica Community Update- COVID-19 Response
Strategy		
102-14	Statement from senior decision-maker	Leadership Message
102-15	Key impacts, risks, and opportunities	ESG Impact Assessment , Business Risk Management , 2021 CDP Response , 2020 Annual Report

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 102: Organizational Profile (Continued)		
Ethics and integrity		
102-16	Values, principles, standards, and norms of behavior	<p>Our Company, Reputation, Diversity, Equity & Inclusion, 2020 Annual Report, Corporate Governance, 2021 Proxy Statement, Reputation, Diversity Commitment, Codes of Ethics</p> <p>Corporate Governance Guidelines, Codes of Ethics</p> <p>Our Code of Business Conduct and Ethics for Employees is a key tool for instilling an ethical culture at Comerica and ensuring our compliance with related laws and regulations. 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.</p>
102-17	Mechanisms for advice and concerns about ethics	<p>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. Additionally, 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.</p> <p>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 Code of Business Conduct and Ethics for Employees. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees.</p>
Governance		
102-18	Governance structure	<p>Responsible Business, Corporate Governance, Corporate Governance Guidelines, 2021 Proxy Statement, 2020 Annual Report</p> <p>Responsible Business, Colleagues, Corporate Governance Guidelines</p>
102-19	Delegating authority	<p>Comerica launched an Environmental, Social and Governance (ESG) Council in 2020, comprised of senior leaders working on ESG topics across the bank. This group has set a strategy to further advance Comerica's efforts on ESG topics of importance to Comerica and our stakeholders and reports progress to Comerica's Executive Team, including Comerica's CEO, on a semi-annual basis. The Enterprise Risk Committee of the Board of Directors has responsibility for ESG issues to the extent they present significant risk to the organization. The overall Board of Directors is also informed of significant ESG issues, when appropriate.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>2021 Proxy Statement, Corporate Governance Guidelines, 2021 CDP Response, Most Recent Diversity, Equity & Inclusion Progress Report, Leadership Message</p>
102-21	Consulting stakeholders on economic, environmental, and social topics	<p>ESG Impact Assessment</p>
102-22	Composition of the highest governance body and its committees	<p>Responsible Business, 2021 Proxy Statement, Corporate Governance Guidelines</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 102: Organizational Profile (Continued)		
Governance		
102-23	Chair of the highest governance body	2021 Proxy Statement , Corporate Governance Guidelines
102-24	Nominating and selecting the highest governance body	2021 Proxy Statement , Corporate Governance Guidelines , 2021 CDP Response , Most Recent Diversity, Equity & Inclusion Progress Report
102-25	Conflicts of interest	2021 Proxy Statement , Corporate Governance Guidelines
102-26	Role of highest governance body in setting purpose, values, and strategy	2021 Proxy Statement , Corporate Governance Guidelines
102-27	Collective knowledge of highest governance body	2021 Proxy Statement , Corporate Governance Guidelines
102-28	Evaluating the highest governance body's performance	Corporate Governance , 2021 Proxy Statement
102-29	Identifying and managing economic, environmental, and social impacts	ESG Impact Assessment , Business Risk Management , 2021 CDP Response , Most Recent Diversity, Equity & Inclusion Progress Report , Leadership Message
102-31	Review of economic, environmental, and social topics	ESG Impact Assessment , 2021 CDP Response , Most Recent Diversity, Equity & Inclusion Progress Report ; ESG Council established in 2020
102-32	Highest governance body's role in sustainability reporting	Our CFO reviews and approves Comerica's Corporate Responsibility Report.
102-33	Communicating critical concerns	Business Risk Management , Code of Business Conduct , Employee Engagement
102-35	Remuneration policies	Corporate Governance , 2021 Proxy Statement , Corporate Governance Guidelines
102-36	Process for determining remuneration	Corporate Governance , 2021 Proxy Statement , Corporate Governance Guidelines
102-37	Stakeholders involvement in remuneration	Corporate Governance , 2021 Proxy Statement , Corporate Governance Guidelines

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 102: Organizational Profile (Continued)		
Stakeholder Engagement		
102-40	List of stakeholder groups	ESG Impact Assessment
102-41	Collective bargaining agreements	Comerica does not have any employees under collective bargaining agreements.
102-42	Identifying and selecting stakeholders	ESG Impact Assessment
102-43	Approach to stakeholder engagement	ESG Impact Assessment
102-44	Key topics and concerns raised	ESG Impact Assessment
Reporting practice		
102-45	Entities included in the consolidated financial statements	2020 Annual Report
102-46	Defining report content and topic Boundaries	ESG Impact Assessment
102-47	List of material topics	ESG Impact Assessment
102-48	Restatements of information	There were no material restatements of information provided in this report.
102-49	Changes in reporting	Reporting Methodology
102-50	Reporting period	Reporting Methodology
102-51	Date of most recent report	Reporting Methodology
102-52	Reporting cycle	Reporting Methodology
102-53	Contact point for questions regarding the report	Reporting Methodology
102-54	Claims of reporting in accordance with the GRI Standards	Reporting Methodology
102-55	GRI content index	This GRI Content Index
102-56	External Assurance	This report has not been externally assured. However, we annually assure our Scope 1, 2, and 3 greenhouse gas (GHG) emissions using ISO 14064-3 (limited assurance). Additional GHG emissions assurance details are provided in our 2021 CDP Response .

GRI Standards Content Index: Topic-Specific Disclosures

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 201 Economic Performance 2016		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. 2020 Annual Report
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic, Business Risk Management , 2020 Annual Report
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic, Business Risk Management , 2020 Annual Report
201-2	Financial implications and other risks and opportunities due to climate change	Climate Change Impacts , 2021 CDP Response , Key Metrics (Climate Change and GHG Emissions)
GRI 203 Indirect Economic Impacts 2016		
103-1	Explanation of the material topic and its Boundary	Our Comerica GRI Impact Topics, ESG Lending & Investment, Financial Inclusion & Financial Literacy, Community Investment & Development, Volunteerism & Philanthropy and Diversity, Equity & Inclusion align with the GRI 203 Indirect Economic Impact disclosure. ESG Impact Assessment , ESG-Related Lending & Investment , Environmentally Beneficial Lending , Financial Inclusion and Financial Education , Community Investment & Development , Volunteerism & Philanthropy , Diversity, Equity & Inclusion
103-2	The management approach and its components	<i>Environmentally Beneficial Lending:</i> 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. 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" or 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. <i>Business Resource Groups (BRGs):</i> Our Chief Community Officer has leadership oversight of Comerica's BRG teams, which operate across our primary markets to pursue strategies that meet the banking needs of our diverse communities. Each team is made of individuals who come from diverse backgrounds and from different positions within Comerica. Structurally, the team is assigned an executive sponsor who is a member of the bank's leadership to lead the team's focus. An outreach budget is provided to support business development and community outreach with relevant associations and nonprofit partners serving underserved communities. For example, each team has a goal of conducting financial education opportunities supporting the bank's efforts to raise expectations in the communities we serve. Comerica's BRG teams impacted over \$300 million in new account openings in 2020.

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 203 Indirect Economic Impacts 2016		
103-2	The management approach and its components (continued)	<p><i>Financial Inclusion and Financial Literacy:</i> Coupled with the Comerica Money \$ense program, the bank has developed the Comerica Financial Education Brigade (CFEB), a collection of employee volunteers dedicated to improving the community through financial empowerment. Among other programs, the CFEB supports small businesses through Comerica Business \$ense Boot Camps, SCORE, Pacific Community Ventures and Revive Dallas Small Business Relief Fund - Fast Start Mentoring Program. The CFEB supports Young Entrepreneurz Solutions and Network for Teaching Entrepreneurship, those considering home ownership through our recent partnership with Dallas Area Habitat for Humanity and serving low- and moderate-income (LMI) women and girls in need through our partnership with 50/50 Leadership. All CFEB members are trained in order to teach financial education on behalf of Comerica. Comerica's External Affairs Managers conduct CFEB training each quarter. Refer to GRI 413 Local Communities (103-2) for more information.</p> <p>Comerica regularly evaluates our physical locations in the communities we serve. Periodically, we relocate or consolidate 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.</p> <p>To serve our non-English speaking customers, we offer Spanish language options on our ATMs, Comerica.com, and in the Customer Contact Center. Both English- and Spanish-speaking agents are available in our Customer Contact Centers and we offer translator services to assist customers in other languages, as needed. In addition, Comerica abides by the Americans With Disabilities Act (ADA) and provides services for visual and/or hearing-impaired customers.</p>
103-3	Evaluation of the management approach	<p>ESG-Related Lending & Investment, Environmentally Beneficial Lending, Financial Inclusion and Financial Education, Community Investment & Development, Volunteerism and Philanthropy, Most Recent Diversity, Equity & Inclusion Progress Report, Key Metrics (Green Lending), Key Metrics (Diversity, Equity & Inclusion), Green Business News Release</p> <p>The ESG Council was formed in the summer of 2020 and reported to the CEO and leadership team once in 2020. As a result of the ESG Council's 2020 work, additional actions were taken in 2021 including the formation of a Sustainability Finance Council to advance green lending and the development of our ESG platform of key priorities.</p> <p><i>Environmentally Beneficial Lending:</i> In 2020, we implemented efforts to further ensure that our green lending numbers are accurate and complete. We developed a new on-demand training for colleagues with responsibilities for loan coding to provide instruction on how to properly code green-related loans. Additionally, we have implemented spot-checks of Commercial Bank loan documents looking for key words that may indicate a green loan followed up by additional research to confirm that we were not missing loans that should have been coded as green at loan origination, but were not, or loans that should not have been coded as green.</p> <p><i>BRG Teams:</i> Comerica's BRG teams impacted over \$300 million in new account openings in 2020.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 203 Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	<p data-bbox="562 339 1731 389">Key Metrics (Community), Financial Inclusion & Financial Education, Community Investment & Development, Volunteerism & Philanthropy, Comerica Charitable Giving, Comerica Works®, CRA</p> <p data-bbox="562 419 1777 626"><i>Investing in Neighborhood Revitalization and Small Business:</i> Comerica serves the needs of the communities in which we operate. A good example of this is our 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.</p> <p data-bbox="562 656 1777 786">Additionally, some investment activity is used to preserve affordability in locations experiencing increases in rental rates. Further investment activity stimulates business investment in distressed communities. Our commercial and philanthropic 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.</p> <p data-bbox="562 816 1777 972"><i>Community Reinvestment Act:</i> In January 2020, Comerica named Irvin Ashford, Jr. its Chief Community Officer, with responsibility for community reinvestment nationally and all associated activities, including development, lending, community investments, volunteerism and data analysis. Comerica is dedicated to seeking advice and counsel from its Community Development Advisory Councils (CDACs) and informing its CDACs regarding pertinent CRA and business strategies. There is one national council and three regional councils representing the community interests of their respective markets. A CDAC membership roster can be found on comerica.com/CDAC.</p> <p data-bbox="562 1002 1777 1186">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. For more details on Comerica's CRA progress, please review our Community Reinvestment Act page on Comerica.com.</p>
203-2	Significant indirect economic impacts	<p data-bbox="562 1205 1777 1290">Financial Inclusion & Financial Education, Community Investment & Development, Volunteerism & Philanthropy, Comerica Charitable Giving, Comerica Works®, Community Reinvestment Act page on Comerica.com, Key Metrics (Community), See 203-1 above.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 204 Procurement Practices 2016		
103-1	Explanation of the material topic and its Boundary	<p>This is not a Comerica GRI Impact Topic. Supplier Diversity Program</p> <p>In 2020, Comerica had over 3,000 active suppliers and an annual supplier spend of approximately \$700 million dollars, 67% of which is with our top 100 active suppliers. 51% of our supply base (by number of suppliers) and 29% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,029 suppliers in Michigan and 562 suppliers in Texas.</p>
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic, Supplier Diversity Program , 2021 CDP Response (question 12.1a) , Key Metrics (Diversity, Equity & Inclusion) , Key Metrics (Supplier Sustainability Engagement)
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic, Supplier Diversity Program , 2021 CDP Response (question 12.1a) , Key Metrics (Diversity, Equity & Inclusion) , Key Metrics (Supplier Sustainability Engagement)
204-1	Proportion of spending on local suppliers	51% of our supply base (by number of suppliers) and 29% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,029 suppliers in Michigan and 562 suppliers in Texas.
GRI 205 Anti-corruption 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topics, Anti-Corruption, Ethics and Countering Bribery and Business Risk Management, align with GRI 2015 Anti-corruption.</p> <p>ESG Impact Assessment, Anti-Corruption, Ethics and Countering Bribery</p> <p>Anti-Corruption, Ethics & Countering Bribery, Business Risk Management, 2020 Annual Report, Corporate Governance</p> <p><i>Codes of Ethics:</i></p> <p>Our Code of Business Conduct and Ethics for Employees is a key tool for instilling an ethical culture at Comerica and ensuring our compliance with related laws and regulations. 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.</p>
103-2	The management approach and its components	<p>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. Additionally, 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.</p> <p>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 Code of Business Conduct and Ethics for Employees. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 205 Anti-corruption 2016		
103-2	The management approach and its components (continued)	<p><i>Countering Corruption:</i> 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. As such, 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).</p> <p>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. We continue to manage regulatory expectations and follow proposed legislation.</p> <p>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.</p>
<p>Key Metrics (Responsible Business), Business Risk Management, 2020 Annual Report, Corporate Governance</p>		
103-3	Evaluation of the management approach	<p>Our approach to anti-corruption, ethics & countering bribery is reviewed on an ongoing basis and adjustments to our policies and procedures are made when appropriate. 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 2020, 45 complaints were recorded via the Human Resources hotline, all of which were resolved. There were no labor practice grievances filed through formal grievance mechanisms in 2020.</p> <p>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 99.8% of applicable employees doing so in 2020. Our training is updated as warranted to cover additional emerging issues related to anti-corruption.</p> <p>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 2020 that would have a material adverse effect on our operations or ability to perform the services we offer.</p>
205-1	Operations assessed for risks related to corruption	<p>Comerica’s Risk and Control Self-Assessment process documents Operational Risks. This risk assessment is conducted by business units and updated annually. Significant Operational Risks are identified in Comerica’s 2020 10-K (Item 1A-Risk Factors).</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 206 Anti-competitive Behavior 2016		
103-1	Explanation of the material topic and its Boundary	Our GRI Impact Topic, Anti-Corruption, Ethics & Countering Bribery, aligns with GRI 206 Anti-competitive behavior. See information provided for GRI 205 Anti-corruption 2016
103-2	The management approach and its components	See information provided for GRI 205 Anti-corruption 2016
103-3	Evaluation of the management approach	See information provided for GRI 205 Anti-corruption 2016
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly	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 2020 that would have a material adverse effect on our operations or ability to perform the services we offer. There were no violations of anti-trust or monopoly legislation in which Comerica was identified as a participant in 2020.
GRI 207 Tax 2019		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. Responsible Business , Business Risk Management , Key Metrics (Our Company)
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic, Responsible Business , Business Risk Management
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic, Business Risk Management
GRI 300 Environmental Standards Series		
GRI 301 Materials 2016		
103-1	Explanation of the material topic and its Boundary	Our GRI Impact Topic, Environmental Resource Management, aligns with GRI 301 Materials. ESG Impact Assessment , Environmental Policy Statement
103-2	The management approach and its components	Environmental Resource Management , Environmental Policy Statement Refer to disclosure GRI 303 Water and Effluents for information on water and GRI 306 Waste for information on waste.

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 301 Materials 2016		
103-3	Evaluation of the management approach	<p>Environmental Resource Management, Refer to Evaluation of Environmental Sustainability information shared in GRI 302:103-3 Energy.</p> <p><i>Paper:</i></p> <p>Key actions that have led to progress on our 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.</p> <p>The COVID-19 pandemic impacted how our colleagues used office copy paper in 2020. We significantly reduced our purchases of office copy paper (down 44% from year end 2019) as up to 65% of our workforce was working remotely and found ways to print less. Additionally, we saw a 51% decrease in marketing paper purchases. One specific project in 2020 that helped to reduce paper usage within our Retail operations was the Retail Imaging Services (RIS) project. The RIS project is an electronic repository for customer signature cards and account documents, in an effort to reduce the need for paper versions while making the process of viewing documents easier and more efficient. We did see an increase in our other office papers purchased in 2020 (specifically envelopes and statement paper purchases through one of our paper suppliers) as these papers are purchased in bulk on an more infrequent basis ahead of when they are anticipated to be consumed.</p> <p>Our management of paper usage continues to be effective and continue to update our approach as conditions warrant.</p>
301-1	Materials used by weight or volume	Key Metrics (Environmental Resource Management-Paper)
301-2	Recycled input materials used	Key Metrics (Supplier Sustainability Engagement)
301-3	Reclaimed products and their packaging materials	Key Metrics (Environmental Resource Management- Waste)
GRI 302 Energy 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Energy & Emissions, aligns with GRI 302 Energy.</p> <p>ESG Impact Assessment, Energy & Emissions</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 302 Energy 2016		
103-2	The management approach and its components	<p data-bbox="562 341 1257 362">Energy & Emissions, Environmental Policy Statement, 2021 CDP Response</p> <p data-bbox="562 394 1769 604">Approach to Environmental Sustainability: 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.</p> <p data-bbox="562 632 1769 789">Our operational environmental impacts include GHG emissions, energy, fuel and 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 our environmental-related Impact Topics (Energy & Emissions and Environmental Resource Management) as well as for Water Stewardship. This is done 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.</p> <p data-bbox="562 818 1769 975">Approach to Energy and Emissions: To actively reduce climate change risks associated with our operations, we focus our efforts on two key areas: reducing energy use and reducing GHG emissions. In addition to multiple environmental benefits, there are also business benefits including creating a more desirable workplace, improving colleague retention and attraction, customer appeal and company profitability. Reducing energy consumption is key to minimizing our GHG emissions footprint since the majority of our direct GHG emissions are related to energy used to operate our buildings. For more details on Comerica's 2020 energy consumption, GHG emissions (Scope 1-3) and reduction initiatives, refer to our 2021 CDP Response.</p>
103-3	Evaluation of the management approach	<p data-bbox="562 996 749 1018">Energy & Emissions</p> <p data-bbox="562 1049 1769 1262"><i>Evaluation of Environmental Sustainability:</i> Each quarter, a detailed report is produced to track progress across our environmental Key Performance Indicators (KPIs). This KPI report tracks utility-related water, energy usage and emissions along with data for other reported sustainability-related activities, such as corporate travel, 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.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 302 Energy 2016		
103-3	Evaluation of the management approach	The COVID-19 pandemic dramatically affected occupancy rates within Comerica's office buildings. But overall, building operation schedules remained relatively consistent with previous years. Comerica implemented energy efficiency programs at our larger campus facilities over the last several years to schedule lighting and HVAC operation with building user occupancy by zones within the facilities, realizing immediate energy savings. These best practices are now in use across the organization, where systems allow such programming. Comerica added this flexibility to eight additional buildings in 2020. In addition, Comerica continued improving energy efficiency in buildings, with targeted capital projects, ongoing efficiency upgrades during routine maintenance, and improved processes such as an annual portfolio-wide thorough review of mechanical control systems. Energy consumption reductions were driven primarily by reduced occupancy in our largest buildings. Comerica also expanded CoWork, a shared work environment initiative, which helps us to reduce square footage while incorporating more ergonomic features, updated computers and other technology to allow for mobility within the workspace. Six additional buildings received CoWork consolidation in 2020.
302-1	Energy consumption within the organization	Energy & Emissions, Key Metrics (Energy), 2021 CDP Response
302-2	Energy consumption outside of the organization	Energy & Emissions, Key Metrics (Energy), 2021 CDP Response
302-3	Energy intensity	Energy & Emissions, Key Metrics (Energy), 2021 CDP Response
302-4	Reduction of energy consumption	Energy & Emissions, Key Metrics (Energy), 2021 CDP Response
302-5	Reductions in energy requirements of products and services	Energy & Emissions, Key Metrics (Energy), 2021 CDP Response
GRI 303: Water and Effluents		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. Environmental Policy Statement
		Environmental Resource Management
103-2	The management approach and its components	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.

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 303: Water and Effluents		
103-2	The management approach and its components (continued)	<p>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.</p> <p>As a company, Comerica's water usage is split 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 irrigation controls systems at selected 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.</p> <p>Even though the pandemic dramatically affected occupancy rates within Comerica's office buildings, in 2020, our water usage only slightly decreased (down 1.1%). The primary driver of the decrease was reduced domestic water use due to lower occupancy in large buildings. Irrigation schedules were tightened, but landscaping still required water throughout 2020.</p>
103-3	Evaluation of the management approach	Refer to Evaluation of Environmental Sustainability information shared 302 Energy 103-3 .
303-3	Water withdrawal by source	<p>Key Metrics (Water)</p> <p>OMISSION: Information not available for 303-3: Although we have a couple wells and ponds in Michigan for irrigation purposes, the overwhelming majority of our water is provided by municipal sources, with consumption tracked through the utility water meters.</p>
GRI 305 Emissions 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topics, Energy & Emissions and Climate Change Impacts, align with GRI 305 Emissions.</p> <p>ESG Impact Assessment, Energy & Emissions</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 305 Emissions 2016		
103-2	The management approach and its components	<p>Energy & Emissions, Environmental Policy Statement, 2021 CDP Response; Refer to Approach to Environmental Sustainability information shared in GRI 302 Energy 103-2.</p> <p>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 some Scope 3 GHG emissions.</p> <p>We have set GHG reduction goals for emissions associated with our real estate operations. Our GHG goals plan to drive reductions averaging approximately 3% annually, a figure generally considered to be in line with "science-based" GHG reduction targets.</p> <p>We use Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard categories for our Scope 3 emissions calculations and publicly report emissions data in all relevant Scope 3 categories, except for Scope 15 Investments (financed emissions). However, we joined the Partnership for Carbon Accounting Financials in 2020 and committed to calculating at least a portion of our financed emissions within three years. We have a Comerica internal working group that was initiated in late 2020 to address this effort.</p>
103-3	Evaluation of the management approach	<p>Energy & Emissions; Refer to Evaluation of Environmental Sustainability information shared in GRI 302 Energy 103-3.</p> <p>The COVID-19 pandemic dramatically affected occupancy rates within Comerica's office buildings. Comerica implemented energy efficiency projects over the last several years that reduced energy consumption and related greenhouse gas emissions. In 2020, Comerica continued improving energy efficiency in buildings, with targeted capital projects, ongoing efficiency upgrades during routine maintenance, and improved processes such as an annual portfolio-wide thorough review of mechanical control systems. Energy consumption reductions were primarily driven by reduced occupancy in our largest buildings.</p> <p>Overall, our approach to the management of GHG emissions has been effective in reducing emissions considerably. We work to adjust our approach, as needed, to achieve further reductions as technologies, policies and situations evolve.</p>
305-1	Direct (Scope 1) GHG emissions	Energy & Emissions , Key Metrics (Climate Change and GHG Emissions) , 2021 CDP Response
305-2	Energy indirect (Scope 2) GHG emissions	Energy & Emissions , Key Metrics (Climate Change and GHG Emissions) , 2021 CDP Response
305-3	Other indirect (Scope 3) GHG emissions	Energy & Emissions , Key Metrics (Climate Change and GHG Emissions) , 2021 CDP Response
305-4	GHG emissions intensity	Energy & Emissions , Key Metrics (Climate Change and GHG Emissions) , 2021 CDP Response
305-5	Reduction of GHG emissions	Energy & Emissions , Key Metrics (Climate Change and GHG Emissions) , 2021 CDP Response

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 306 Waste 2020		
103-1	Explanation of the material topic and its Boundary	Our GRI Impact Topic, Environmental Resource Management, aligns with GRI 306 Waste. ESG Impact Assessment , Environmental Resource Management , Environmental Policy Statement
103-2	The management approach and its components	Environmental Resource Management , Environmental Policy Statement , Key Metrics (Environmental Resource Management) . Refer to Approach to Environmental Sustainability information shared in GRI 302 Energy 103-2 . We are committed to managing resources wisely by minimizing operational waste. We track our landfilled and recycled general office waste through our corporate-wide waste vendor. Comerica has three main solid waste streams: paper, electronics and general office. We also track other recycled items (cardboard, pallets and universal wastes). Our strategy is to continue auditing facilities to identify sites where we can reduce the size of waste-to-landfill containers, reduce the frequency of landfill container collection and increase colleague recycling programs.
103-3	Evaluation of the management approach	Environmental Resource Management , Environmental Policy Statement , Key Metrics (Environmental Resource Management) . Refer to Evaluation of Environmental Sustainability information shared GRI 302 Energy 103-3 . The COVID-19 pandemic dramatically affected occupancy rates within Comerica's office buildings. Comerica reduced our waste pickup frequencies at our office buildings given that we were not generating as much waste during 2020. Retail banking centers primarily remained populated and occupied as part of essential community services, and therefore had relatively normal waste generation and disposal. Overall, our approach to the management of waste has been effective in achieving reductions. We work to adjust our approach, as needed, to achieve further reductions as technologies, policies and situations evolve.
306-1	Management: Waste generation and significant waste-related impacts	Key Metrics (Environmental Resource Management) , Environmental Resource Management , Environmental Policy Statement ; Refer to content shared for GRI 306 103-2 above.
306-2	Management: Management of significant waste-related impacts	Environmental Resource Management , Environmental Policy Statement , Key Metrics (Environmental Resource Management) ; Refer to content shared for GRI 306 103-3 above.
306-3	Waste generated	Key Metrics (Environmental Resource Management) ; reported in U.S. tons
306-4	Waste diverted from disposal	Key Metrics (Environmental Resource Management) ; reported in U.S. tons
306-5	Waste directed to disposal	Key Metrics (Environmental Resource Management) ; reported in U.S. tons

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 307 Environmental Compliance 2016		
103-1	Explanation of the material topic and its Boundary	<p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p>ESG Impact Assessment, Business Risk Management</p> <p>Environmental risk is an increasingly relevant and high-profile issue for the private sector. For Comerica, such risk includes both the environmental impact associated with our own operations as well as those impacts of our customers' operations.</p>
103-2	The management approach and its components	<p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p>Business Risk Management; Refer to Environmental Sustainability information shared in GRI 302 Energy- 103-2.</p> <p>Omission: Information related to management approach not provided since this is not an Impact Topic</p>
103-3	Evaluation of the management approach	<p>This is not a standalone Comerica GRI Impact Topic, but is incorporated into our Business Risk Management Impact Topic.</p> <p>Business Risk Management; Refer to Approach to Environmental Sustainability information shared in GRI 302 Energy- 103-3.</p>
307-1	Non-compliance with environmental laws and regulations	<p>There were no significant fines or monetary sanctions associated with non-compliance of environmental laws and regulations in 2020 that would have a material adverse effect on our operations or ability to perform the services we offer.</p>
GRI 308 Supplier Environmental Assessment 2016		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic.
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
308-1	New suppliers that were screened using environmental criteria *Not a topic material	Key Metrics (Supplier Sustainability Engagement) ; 2021 CDP Response (Question 12.1a)

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 401 Employment 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Talent Attraction, Development & Retention, aligns with GRI 401 Employment.</p> <p>ESG Impact Assessment, Talent Attraction, Development & Retention, Employee Engagement, Most Recent Diversity, Equity & Inclusion Progress Report</p>
<p>Talent Attraction, Development & Retention, Employee Engagement, Most Recent Diversity, Equity & Inclusion Progress Report, Comerica's 2020 10-K (Human Capital Disclosure, Pages 11-12)</p>		
<p>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.</p>		
103-2	The management approach and its components	<p>Talent Attraction: Our recruitment practices ensure that we hire the best candidates with the appropriate skill sets and values, pay competitive wages, and provide benefits that fit our demographics. 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.</p> <p>Talent Development: Performance management at Comerica includes goals, results, behavioral expectations, and the development activities needed to support our colleagues. 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.</p> <p>Talent Retention (see employee benefits under GRI 401-2): 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.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 401 Employment 2016		
103-3	Evaluation of the management approach	<p>Talent Attraction, Development & Retention, Most Recent Diversity, Equity & Inclusion Progress Report, Comerica's 2020 10-K (Human Capital Disclosure, Pages 11-12)</p> <p>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.</p> <p>We have processes, procedures and policies in place to ensure the proper management of our efforts related to Talent Attraction, Development & Retention. These are evaluated annually and in several areas are part of our annual internal audit review. We also complete Risk Assessments on a scheduled basis and receive a rating from the Risk Department.</p> <p>In 2020, we saw impact on talent availability (Due to the pandemic and school closures, we believe that female candidates were more unavailable in the workforce in 2020), the ability to effectively assess talent in a timely manner, and the ability to onboard talent. Talent Availability issues were addressed through promoting work from home as a benefit where possible and the enhanced colleague benefits offered to our employees. Comerica Talent Acquisition expanded the use of on demand video interviewing to cover roughly 75% of all key profile roles. Additionally, the Talent Acquisition team utilized our webinar platform as a resource for live interviews, allowing the team to effectively convert qualified applicants through the process. We converted our intern program to a virtual one with positive reviews, boosted awareness around social justice issues via our employee resource network groups and provided tools and resources such as paid time for quarantines, dependent day care stipends, enhanced cleaning protocols, etc. to help keep our colleagues safe and supported during the year.</p> <p>In 2020, we were also committed to providing additional employee programs such as additional Promise Pay and meal subsidies for essential workers who could not work from home, dependent care stipends, special COVID-19 recognition awards for extraordinary efforts and special circumstances pay for quarantines and time to get tested or vaccinated. With the successful vaccination rollout underway and the move to herd immunity, we are launching a slow phased approach to returning to the office in 2021 that will allow us to monitor our progress and be flexible along the way to response to any changes in health metrics and CDC, State and Local guidance. In addition to direct pay, health and welfare, and retirement benefits, Comerica provides a wide range of supplemental programs and special services to help colleagues meet their personal needs and goals. In 2020, Comerica added broad-based financial coaching, an Emergency Leave Policy and enhanced mental health coverage.</p>
401-1	New employee hires and employee turnover	<p>Talent Attraction, Development & Retention, Employee Engagement, Key Metrics (New Hires), Key Metrics (Employee Turnover)</p> <p>In 2020, we saw low turnover rates, which dropped to 11.6% (down from 16.8% in 2019). In addition, we hired 833 new colleagues, demonstrating our commitment to our talent.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 401 Employment 2016		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>To support the full spectrum of employee needs, we offer the following benefits to full-time employees: Medical¹, Dental¹, Vision¹, Accident¹, Critical Illness¹, Hospital Indemnity¹, Employee Assistance Program¹, Short-term Disability/Long-term Disability, Life Insurance, AD&D, and Dependent Life¹, 401(K) Plan and Employer Match¹, Retirement Income Account Plan¹, Employee Stock Purchase Plan¹, Health Accounts^{1,2}, Financial Counselling & Product Discounts, Paid Time Off Program¹, Paid Holidays¹, Group Legal¹, Tuition Assistance Program (TAP), and Financial Coaching³.</p> <p>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 2020.</p>
GRI 402 Labor/Management Relations 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Employee Engagement, aligns with GRI 402 Labor/Management Relations.</p> <p>ESG Impact Assessment, Colleagues, Employee Engagement</p>
		<p>Colleagues, Talent Attraction, Development & Retention, Employee Engagement, Comerica's 2020 10-K (Human Capital Disclosure, Pages 11-12)</p> <p>Where needed, we have processes, procedures and policies in place to ensure the proper management of our efforts related to Employee Engagement, which are evaluated annually.</p> <p>On an annual basis, key impact topics are measured through a set of Key Performance Indicators that measure over performance both quantitatively and qualitatively. Employee engagement levels are measured with survey participation rates at the enterprise and line of business levels, sustainability scores and the robustness of the follow-up action plans.</p>
103-2	The management approach and its components	<p>We keep our 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.</p> <p>To support engagement and adoption, an organizational change management (OCM) team ensures all colleagues impacted by large Comerica initiatives are fully engaged in the change journey. The OCM service model supports business leaders as they engage colleagues in preparing for and adopting change.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 402 Labor/Management Relations 2016		
103-2	The management approach and its components (continued)	<p>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.</p> <p>Colleagues, Talent Attraction, Development & Retention, Employee Engagement, Key Metrics Table (Employee Engagement)</p> <p>2020 presented many unexpected changes for our workforce. Comerica used its established OCM practices to proactively engage colleagues in maintaining and strengthen our culture. OCM colleagues are also full working partners in the Technology project selection and funding process. This partnership ensures that colleague impact and colleague support are built into every large technology initiative.</p>
103-3	Evaluation of the management approach	<p>During the COVID-19 pandemic, we expanded our use of existing channels and incorporated new ones to ensure we kept our colleagues informed and engaged throughout the challenging period. This included building an intranet site dedicated to COVID-related news, tools, announcements, and resources; sending daily COVID email digests to communicate protocol changes, benefit enhancements, self-health reminders and available support resources; providing targeted discussion boards to build comradery among our dispersed workforce; and hosting virtual webinars, town halls and executive videos to address colleague questions and calm pandemic-related concerns, as well as to foster critical dialogue around social injustice issues in response to external events impacting our colleagues lives.</p> <p>In 2020, we initiated a new employee engagement initiative called the Voice of the Colleague. Our 2020 colleague survey participation rate was 84%, which is 14% higher than benchmarked companies. We used the results of the Voice of the Colleague survey to develop and implement strategies to address areas where improvement in metrics were desired, in line with our overall corporate strategies. The success of these strategies will be evaluated using the results of future such surveys.</p>
402-1	Minimum notice periods regarding operational changes	The minimum notice period for significant operational changes is 45 days (6.4 weeks) unless the change triggers the provisions of the Worker Adjustment and Retraining Notification (WARN) act in which case a minimum of 60 days notice is provided.
GRI 403 Occupational Health and Safety 2018		
103-1	Explanation of the material topic and its Boundary	<p>This is not a Comerica GRI Impact Topic.</p> <p>While Employee Health & Safety was not listed as an Impact Topic when our ESG Impact Assessment Report was last updated, the COVID-19 pandemic increased its importance during 2020 at Comerica and throughout the financial services industry.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 403 Occupational Health and Safety 2018		
103-2	The management approach and its components	<p>This is not a Comerica GRI Impact Topic.</p> <p>From the beginning of the COVID-19 pandemic in early 2020 to today, our focus has been on the health and safety of our colleagues and customers while still providing the critical services that are needed to meet our customers' financial needs. We enabled up to 65% of our employees to work from home immediately and protected our essential workers with the proper personal protection equipment (PPE) and safety measures such as social distancing, cleaning, ventilation, limited building access as needed for employees and customers, daily health attestation, contact tracing and quarantines as needed. We developed guiding principles and a full playbook that followed the U.S. Center for Disease Control, State and Local Health department metrics and orders to protect our employees and put all the preventive measures in place for our continued success.</p>
103-3	Evaluation of the management approach	<p>This is not a Comerica GRI Impact Topic. 2020 Annual Report- COVID-19 Response (Page 2)</p> <p>In 2020, we built a process to complete COVID-19 tracking and tracing when employees became ill and to manage all of our COVID-19 pay programs including quarantine pay, underlying health conditions, dependent care stipends and Promise Pay for colleagues who remained working onsite.</p> <p>Comerica's Procurement group has worked during the pandemic to ensure Comerica colleagues are protected when they are required to perform their job duties onsite at a Comerica facility through use of masks, gloves, sanitizers and other PPE. An intentional decision was made to be inclusive in the sourcing process to seek out diverse suppliers that could provide PPE. With help from the advocacy organizations for minority, women and veteran businesses, a list was compiled of capable suppliers. The final list of suppliers selected for sourcing included two minority-owned companies in Michigan to supply hand sanitizers and cleaning solutions and a woman-owned company in Nevada to supply face masks to protect our colleagues.</p>
GRI 404 Training and Education 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Talent Attraction, Retention & Development, aligns with GRI 404 Training and Education.</p> <p>ESG Impact Assessment, Talent Attraction, Development & Retention</p> <p>Key Metrics (Responsible Business), Key Metrics (Talent Development), Talent Attraction, Development & Retention</p>
103-2	The management approach and its components	<p>Comerica's learning and development activities provide top quality training and development for all colleagues, from compliance to skills training, and support managers and employees through counselling and facilitating talent management reviews.</p> <p>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 2020, 99.9% 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.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 404 Training and Education 2016		
103-2	The management approach and its components (continued)	Performance management at Comerica includes goals, results, behavioral expectations, and the development activities needed to support our colleagues. 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.
103-3	Evaluation of the management approach	Talent Attraction, Development & Retention, Most Recent Diversity, Equity & Inclusion Progress Report In 2020, we saw challenges around delivery related to training on key initiatives and leadership skills. Comerica shifted many of the training opportunities from on-site to virtual options in 2020.
404-1	Average hours of training per year per employee	Key Metrics (Talent Development) OMISSION: Information unavailable for 404-1: Average hours of training broken down by gender and employee category.
404-2	Programs for upgrading employee skills and transition assistance	Talent Attraction, Development & Retention, Key Metrics (Talent Retention) To reinforce our culture of development, we included a new section in our annual performance review process that specifically focuses on each colleague's strengths and development opportunities. In our Succession Management process for Vice Presidents and above, we added a section that holds managers accountable for ensuring appropriate development for each colleague.
GRI 405 Diversity and Equal Opportunity 2016		
103-1	Explanation of the material topic and its Boundary	Our Impact Topic, Diversity, Equity & Inclusion, aligns with GRI 405 Diversity and Equal Opportunity. Please note that we added the word "Equity" to our former Diversity & Inclusion Impact topic in 2021. The name will be updated in the ESG Impact Assessment report during its next update. ESG Impact Assessment
103-2	The management approach and its components	Most Recent Diversity, Equity & Inclusion Progress Report
103-3	Evaluation of the management approach	Most Recent Diversity, Equity & Inclusion Progress Report
405-1	Diversity of governance bodies and employees	Diversity, Equity & Inclusion, Board Diversity, Most Recent Diversity, Equity & Inclusion Progress Report, Key Metrics Table (Diversity, Equity & Inclusion), Key Metrics Table (Board Diversity)
405-2	Ratio of basic salary and remuneration of women to men	OMISSION: Aggregated data on remuneration without detailed accompanying context makes broad comparisons difficult. We continue to evaluate this issue and expect to make additional disclosures in the future.

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 412: Human Rights Assessment		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic.
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Comerica primarily does business in the United States and has no significant presence or investment in countries where there is a known lack of human rights protection. Accordingly, we do not screen suppliers or investments specifically for human rights issues at this time.
GRI 413 Local Communities 2016		
103-1	Explanation of the material topic and its Boundary	Our GRI Impact Topics, Community Investment & Development; Volunteerism & Philanthropy, Financial Inclusion & Financial Education, align with GRI 413 Local Communities. ESG Impact Assessment , Community Investment & Development , Financial Inclusion & Financial Education , Volunteerism & Philanthropy , Comerica Charitable Giving , CRA , Business Risk Management
103-2	The management approach and its components	Community Investment & Development , Financial Inclusion & Financial Education , Volunteerism & Philanthropy , Comerica Charitable Giving , CRA , Business Risk Management , Community <i>Community Investment & Development:</i> In January 2020, Comerica named Irvin Ashford, Jr. its Chief Community Officer, with responsibility for community reinvestment nationally and all associated activities, including development, lending, community investments, volunteerism and data analysis. Comerica is dedicated to seeking advice and counsel from its Community Development Advisory Councils (CDACs) and informing its CDACs regarding pertinent CRA and business strategies. There is one national council and three regional councils representing the community interests of their respective markets. A CDAC membership roster can be found on comerica.com/CDAC .

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Community Investment & Development (continued):</i></p> <p>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. For more details on Comerica's CRA progress, please review our Community Reinvestment Act page on Comerica.com.</p> <p>We require new External Affairs staff to take our in-house CRA training. Comerica also participates in peer bank meetings across our markets to benchmark our performance and share best practices in addressing CRA regulations and to achieve the greatest possible impact in our community development efforts. For more information, refer to the Community Reinvestment Act (CRA) page on Comerica.com.</p> <p>External Affairs trained 640 individuals on CRA-related topics in 2020, including External Affairs and other colleagues focused on community efforts, Executive Leadership and their direct reports, Comerica Incorporated Board of Directors and Comerica's Community Development Advisory Councils.</p> <p>One of the ways that Comerica supports our communities is through our 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. Further investment activity stimulates business investment in distressed communities. 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.</p> <p>In July 2020, Comerica distributed its first Comerica Community Insights e-newsletter to communicate changes underway, to help our community partners informed about available tools and resources, and to share our national response to COVID-19. The e-newsletter was distributed to Comerica's National CDAC members, nonprofit community partners and centers of influence.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Financial Inclusion & Financial Education:</i></p> <p>Coupled with the Comerica Money \$ense program, the bank has developed the Comerica Financial Education Brigade (CFEB), a collection of employee volunteers dedicated to improving the community through financial empowerment. Among other programs, the CFEB supports small businesses through Comerica Business \$ense Boot Camps, SCORE, Pacific Community Ventures and Revive Dallas Small Business Relief Fund - Fast Start Mentoring Program. The CFEB supports Young Entrepreneurz Solutions and Network for Teaching Entrepreneurship, those considering home ownership through our recent partnership with Dallas Area Habitat for Humanity and serving low- and moderate-income (LMI) women and girls in need through our partnership with 50/50 Leadership. All CFEB members are trained in order to teach financial education on behalf of Comerica. Comerica's External Affairs Managers conduct CFEB training each quarter. In 2020, we had 753 Comerica colleagues within the Comerica Financial Education Brigade.</p> <p>Comerica regularly evaluates our physical locations in the communities we serve. Periodically, we relocate or consolidate 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. To serve our non-English speaking customers, we offer Spanish language options on our ATMs, Comerica.com, and in the Customer Contact Center. Both English- and Spanish-speaking agents are available in our Customer Contact Centers and we offer translator services to assist customers in other languages, as needed. In addition, Comerica abides by the Americans With Disabilities Act (ADA) and provides services for visual and/or hearing-impaired customers.</p> <p>Comerica's Customer Contact Center launched a multi-phased project in 2018 to apply next-generation and natural language speech technologies to its Interactive Voice Response (IVR) system. This offered customers easier access to their account information and to make transactions 24 hours a day, 7 days a week. In 2019, enhanced authentication was added using to protect customer accounts from fraudulent activity using VoiceSafe – a customer-initiated voice print feature. In 2020, due to the COVID-19 pandemic, additional customer service representatives were added to support the increased call volume.</p> <p>To meet the needs of the underbanked, we have tailored products, such as the Comerica Secured Credit Card, which is an entry-level, cash-secured credit card that helps those who do not qualify for a traditional credit card build credit history. In addition to helping expand our customers' access to credit, we offer the Access Checking account with a flat monthly fee, or no fee with direct deposit. We also offer a Statement Savings account, which has no monthly maintenance fee if the customer maintains any Comerica personal checking account and encourages good saving habits. Finally, we are currently working on improving the customer experience by making it easier for customers to open accounts at their convenience through Comerica's online account opening platform.</p> <p>In 2008, 2014 and again in 2020, 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.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Financial Inclusion & Financial Education (continued):</i> Direct Express® Key Metrics:</p> <ul style="list-style-type: none"> • Serves 4.5 million federal benefit recipients • Comerica has achieved a 92% (or better) cardholder satisfaction rating • One of the most secure prepaid cards in the industry with 100 percent of cardholders using EMV chip and PIN <p>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. 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. 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 92% (or better) cardholder satisfaction rating every year since the program's inception.</p> <p>Protecting Vulnerable Benefit Recipients from Fraud: 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% 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.</p> <p>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.</p> <p>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% 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 Everfi to provide educational modules for cardholders to utilize.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Volunteerism & Philanthropy:</i></p> <p>Serving our communities is at the core of who we are at Comerica and what makes our colleagues stand out. Our volunteer efforts positively impact our reputation and the ability to meet our business goals. It also allows us to fulfill the promise we have made to our communities, customers and our colleagues.</p> <p>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 Senior Diversity & Inclusion Consultant- Social Impact Practices leader 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.</p> <p>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. 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.</p> <p>We have processes, procedures, and policies in place to ensure that our financial support aligns with our giving priorities, we utilize our charitable contributions in the most prudent manner, and our program is legally compliant. We define our success by ensuring that we diversify our giving portfolio to maximize our impact in our markets, support financially stable organizations that are responsive to the needs of the communities which they serve, and consistently review and evaluate the impact of our charitable giving.</p>
<p>Comerica Community Update- COVID-19 Response Report, Community, Community Investment & Development, Volunteerism & Philanthropy, Diversity Commitment, Comerica Charitable Giving, CRA, Business Risk Management, Key Metrics (Community)</p>		
103-3	Evaluation of the management approach	<p><i>Community Investment & Development:</i></p> <p>In 2020, the External Affairs team swiftly and effectively changed course to continue to meet basic needs of small businesses during COVID such as food insecurities and PPE and provide support for small businesses. In March 2020, Comerica Bank and Comerica Charitable Foundation committed the first \$4 Million to COVID relief and CDFIs, followed by a second \$4 Million commitment in May 2020 and a \$10 Million investment in Minority Depository Institutions in Michigan, Texas and California in August 2020. Comerica remained focused on meeting the needs of small businesses impacted by COVID-19. Comerica's participation in the Small Business Association Paycheck Protection Program (PPP), a federal program designed to keep employees on payroll, offered financial relief to thousands of businesses. The support provided by Comerica through the program resulted in more than 14,700 loans processed totaling \$3.9 billion in PPP loans funded in 2020.</p>

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GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
		<i>Community Investment & Development (continued):</i>
103-3	Evaluation of the management approach (continued)	<p>In October 2020, Comerica named Beatrice Kelly as Director of Community Development Lending, who is responsible for growing Comerica's community development lending efforts. In June 2020, Comerica made a \$10MM investment in a \$41MM New Market Tax Credit Fund, which accounted for a 24% ownership. Comerica's investment went to six developments in qualified low-income communities and provided benefits such as: (1) permanent/ construction job creations in Michigan and Texas; (2) access to affordable, fresh and healthy food through the construction and redevelopment of a grocery store in a low-income community in Kalamazoo, MI, and (3) programming to serve low-income and special needs children in San Antonio and increasing the hot meal capacity of a local Housing Food Bank.</p> <p>Our Community team evaluates our socioeconomic compliance in terms of our CRA performance on an ongoing basis. Results of these assessments are shared with executive management and adjustments made to improve our performance in targeted areas.</p> <p><i>Volunteerism & Philanthropy:</i></p> <p>Due to COVID 19, we have pivoted our financial education programming to offer online training and provide virtual volunteering opportunities through which our colleagues were still able to make a difference. In 2020, we pivoted from our traditional approach for funding community partners. We identified nonprofit partners who historically had a track record and specialization in responding to disaster relief to directly support COVID-19 relief efforts. We reallocated, increased and accelerated funding to these organizations.</p>
413-2	Operations with significant actual and potential negative impacts on local communities	<p>For additional information, please visit Community Reinvestment page on Comerica.com.</p> <p>OMISSION: Information not available. Operations with significant actual and potential negative impacts on local communities not provided.</p>
GRI 415 Public Policy 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Public Policy & Government Relations, aligns with GRI 415 Public Policy.</p> <p>ESG Impact Assessment, Public Policy & Government Relations, Political Activities and Contributions</p> <p>Public Policy & Government Relations, Political Activities and Contributions</p>
103-2	The management approach and its components	<p>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.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 415 Public Policy 2016		
103-2	The management approach and its components (continued)	<p>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</p> <p>Current public policy challenges facing Comerica include legislative and regulatory efforts to limit or prohibit certain services and fees provided by banks and remaining engaged in the debate over such ongoing legislative issues as consumer privacy, cybersecurity, and Community Reinvestment Act (CRA) modernization.</p> <p>With respect to public policy for environmental and climate change issues, we annually review 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 2020, we did not identify any such conflicts.</p>
103-3	Evaluation of the management approach	<p>Political Activities and Contributions</p> <p>Our primary public policy engagement activities are led by our Government Relations office, evaluated by our executive leadership on an ongoing basis, and adjusted as appropriate when conditions warrant.</p>
415-1	Political contributions	Key Metrics (Responsible Business) , Political Activities and Contributions
GRI 417 Marketing and Labeling 2016		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic.
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
417-2	Incidents of non-compliance concerning product and service information	There were no significant fines in 2020 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.

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 418 Customer Privacy 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Privacy and Information Protection, aligns with GRI 418 Customer Privacy.</p> <p>ESG Impact Assessment, Customers, Privacy & Information Protection, Security Commitment</p> <p>2020 Annual Report</p> <p>Privacy and information protection, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Enterprise Information Protection Framework:</p> <ol style="list-style-type: none"> Strategy and Governance Risk Management Controls Training Monitoring and Testing Response and Recovery Program Maintenance
103-2	The management approach and its components	<p>The goals of the Enterprise Information Protection Framework are:</p> <ol style="list-style-type: none"> 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 <p>For 2020, the global shift to remote work presented opportunities for enhancing our controls with a period of assimilation for all colleagues to meet the added demands and expectations. We initiated a process to enhance pertinent controls and, in partnership with our technology operations team, provided frequent communications to our colleagues on work from home guidelines as aligned to our policies and standards.</p>
103-3	Evaluation of the management approach	<p>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 Officer and Chief Technology Risk & Operational Risk Officer who all work closely with the Enterprise Risk Committee to monitor and continuously improve the program in response to changing risk environments. Our approach to managing customer privacy has proven effective and adjustments to our approach are made as needed in line with our overall risk management strategies.</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 418 Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>Key Metrics-Customers</p> <p>Comerica was not subject to fines or non-monetary sanctions in 2020 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.</p>
GRI 419 Socioeconomic Compliance 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our Impact Topic, Community Investment & Development, aligns with GRI 419 Socioeconomic Compliance.</p> <p>ESG Impact Assessment, Business Risk Management, Community Investment & Development</p>
103-2	The management approach and its components	<p>Community Investment & Development; Community Reinvestment Act page on Comerica.com; Refer to GRI 413: Local Communities (103-2)</p>
103-3	Evaluation of the management approach	<p>Community Reinvestment Act page on Comerica.com; Refer to GRI 413: Local Communities (103-3)</p> <p>Our Community team evaluates our socioeconomic compliance in terms of our CRA performance on an ongoing basis. Results of these assessments are shared with executive management and adjustments made to improve our performance in targeted areas.</p>
419-1	Non-compliance with laws and regulations in the social and economic area	<p>No significant fines or non-monetary sanctions for non-compliance with laws or regulations in 2020 that would have a material adverse effect on our operations or ability to perform the services we offer.</p>
Comerica Impact Topic: Innovation & Technology		
103-1	Explanation of the material topic and its Boundary	<p>Our Impact Topic, Technology & Innovation, does not align with a specific GRI disclosure.</p> <p>ESG Impact Assessment, Innovation & Technology</p>
103-2	The management approach and its components	<p>Innovation & Technology</p> <p>At Comerica, we utilize technology and innovation to enhance our organization and strengthen our relationship-based approach to banking. Comerica's technology teams partner with our lines of business to understand the marketplace and offer data-directed products to help meet the needs of our customers. Our transformational efforts are creating a more data-driven, digitally-centric bank built on a foundation of continuous investment in key technologies and capabilities.</p> <p>Cybersecurity is an essential component of our technology strategy, and we work to keep Comerica and our customers secure. We focus on prevention and protection from issues that threaten customer privacy and security (see Privacy & Information Protection for more details).</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
Comerica Impact Topic: Innovation & Technology		
		Innovation & Technology By concentrating our technology investments on our insight-based product and service offerings and by increasing our efficiency across technology operations, we work to continually raise customer expectations in an increasingly digital world. We equip our workforce with new digital technologies and provide multiple avenues for training and deepening colleague capabilities. We supplement this approach by seeking colleague feedback through opportunity discovery sessions and leveraging intelligent automation. Comerica's process improvement discipline furthers innovative solutions, accelerating applications with the most business value. Rapid adoption of cloud computing has also allowed us to become more scalable, resilient and agile in the development and deployment of solutions for both colleagues and customers.
103-3	Evaluation of the management approach	<p>To respond to the challenges of the COVID-19 Pandemic, our technology teams mobilized colleagues to work from home in response to social distancing regulations and guidelines. Many long-term office employees quickly adapted to this new virtual work environment with the assistance of an upgraded high-speed remote network, laptop pcs, and enterprise collaborative office software to facilitate new intra-department communication channels. To preserve our relationship-oriented business, corporate leaders quickly adapted to virtual video meetings with customers and staff. This served as a model for our colleagues to shift their practices and adopt new operational efficiencies. Our bankers used technology applications and devices to engage and maintain customer relationships. We rapidly pursued virtual solutions for contactless banking and took extra care and attention in teaching our customers a new way-to connect via online banking applications. This helped, our customers overcome any obstacles created by distance.</p> <p>The effectiveness of the management of this topic is addressed through the Technology risk pillar, as described in Business Risk Management. Adjustments are made on an ongoing basis to achieve the desired programmatic outcomes in line with our strategies and risk framework.</p>
N/A	Percent changes in technology solution uses	Innovation & Technology , Key Metrics (Customers)
Comerica Impact Topic: Reputation		
103-1	Explanation of the material topic and its Boundary	<p>Our Impact Topic, Reputation, does not align with a specific GRI disclosure.</p> <p>ESG Impact Assessment, Reputation</p>

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
Comerica Impact Topic: Reputation		
103-2	The management approach and its components	<p>Reputation</p> <p>At Comerica, our business is based on the collective trust of our company by customers, the communities we serve, and the entire value chain. That trust is the foundation of corporate responsibility. Our reputation is impacted by numerous internal and external factors, ranging from customer service and community development to corporate governance and our diversity.</p> <p>Our leadership team actively oversees potential risks to our reputation, and our rigorous monitoring processes help guard against incidents related to compliance, operational risk, and social and environmental risks. We work to monitor these issues across our lines of business and endeavor to provide data responses to various rating and ranking agencies which have impacts on our overall reputation. Areas like our Corporate Quality Process, Investor Relations and Corporate Communications monitor activities to assess and respond to potential reputational issues. In addition, Reputation Risks are monitored and managed through our enterprise risk management framework.</p>
103-3	Evaluation of the management approach	<p>Reputation</p> <p>Through our processes to identify and assess reputational impacts, we proactively manage a wide variety of business operations that affect our reputation. We view of positive ratings, rankings and awards as verification of our approach to reputation management.</p> <p>The effectiveness of the management of this topic is addressed through the Strategic risk pillar, as described in Business Risk Management. Adjustments are made on an ongoing basis to achieve the desired programmatic outcomes in line with our strategies and risk framework.</p>
N/A	Corporate Responsibility Awards/Recognition in the reporting year	Corporate Responsibility Awards and Recognition, Reputation

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GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
Comerica Impact Topic: Transparency		
103-1	Explanation of the material topic and its Boundary	Our Impact Topic, Transparency, does not align with a specific GRI disclosure. ESG Impact Assessment, Transparency
103-2	The management approach and its components	Transparent disclosure instills confidence and trust in our company, and our stakeholders view it as one of the more significant corporate responsibility topics for our business. We are committed to implementation, control and maintenance of systems and procedures to obtain and verify information we disclose. We also comply with numerous disclosure obligations, such as those found in our SEC filings and other regulatory filings. All materials are easily accessible on our website Comerica Investors - Investor Overview , including investor presentations, financial reports, proxy statements, SEC filings and news releases. Also, regulatory required data can be found at Institution Profile - National Information Center (ffiec.gov) .
103-3	Evaluation of the management approach	Comerica provides extensive information on Comerica.com , including investor presentations, annual and quarterly reports, our proxy statements and news releases. Our compliance with disclosure obligations demonstrates our approach to Transparency.
N/A	Number of years that Comerica has published an annual sustainability and/or corporate-responsibility themed report	13 consecutive years