

SASB Content Index

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

Throughout this report, we reference topics and metrics contained in the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Financial Sector. The tables below provides the SASB topic, SASB Code, a description of the accounting metric and an indication if we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents and a link or reference to the location of the disclosure. Comments are also included to provide additional context around our disclosure.

While there are other SASB financial services standards that contain information that may be relevant to a portion of our operations, Comerica has determined the Commercial Banks standards is most applicable for our core business. Additionally, SASB standards use the Sustainable Industry Classification System® (SICS®) to group companies based on shared sustainability risks and opportunities and the SICS® Look-up Tool identified Comerica as classified in the Financials industry and Commercial Banks sector. Where the response to the Commercial Banking standard also includes a response to an additional standard, that SASB Code is also included for reference.

SASB Financials Sector Commercial Banking Standard Disclosures					
SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
Data Security	FN-CB-230a.1 FN-CF-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Partially	Key Metrics- Customers	(2) and (3) not met
	FN-CB-230a.2	Description of approach to identifying and addressing data security risks	Yes	Privacy & Information Protection, Security Commitment	—
Financial Inclusion & Capacity Building	FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	Partially	Community Investment & Development; Key Metrics- Customers; Key Metrics- Community	(1) not met
	FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	Partially	2020 Annual Report (p. F-27)	Metrics provided not explicitly separated by small business and community development
	FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Partially	Key Metrics-Community	Access Checking account fee waived for customers using direct deposit
	FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Yes	Key Metrics-Community; Financial Inclusion & Financial Education; GRI Index, Infographic	—

SASB Commercial Banks Standard Content Index

SASB Financials Sector Commercial Banking Standard Disclosures					
SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
Incorporation of ESG Factors in Credit Analysis	FN-CB-410a.1	Commercial and industrial credit exposure, by industry	Partially	2020 Annual Report (p. F-29 to F-32)	Specific divisions provided do not completely align with SASB categories
	FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Yes	ESG Lending & Investment, 2021 CDP Response (Question C2.2), Environmentally Beneficial Lending, (Environmental Risk Management (2018 CR Report), p. 78-79)	—
Business Ethics	FN-CB-510a.1 FN-AC-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Partially	2020 Annual Report , p. F-98	All legal proceeding expenses declared in Note 21
	FN-CB-510a.2 FN-AC-510a.2	Description of whistleblower policies and procedures	Yes	Code of Business Conduct and Ethics	—
Systemic Risk Management	FN-CB-550a.2 FN-AC-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Yes	Business Risk Management; 2020 Annual Report (p. 2, 3, F-37)	—
Activity Metrics	FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Partially	2020 Annual Report (p. F-6), Key Metrics Table, Financial Inclusion & Financial Education	(1) and (b) not met
	FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Partially	2020 Annual Report (p. F-16), Customers, Key Metrics-Customers, Key Metrics-Community	(1) not met