

ENVIRONMENT



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

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

Comerica's quantitative environmental sustainability goals are provided in the [Energy & Emissions](#) and [Environmental Resource Management](#) sections. In addition, we recognize our impact extends beyond our own footprint and are working to better understand the impacts of our customer-facing business operations including our lending and investment portfolios.

Comerica's Qualitative Environmental Sustainability Goals

Reduce our impact on the environment from GHG emissions	Decrease the amount of materials consumed and business waste disposed at landfills	Use our water resources wisely	Raise the environmental performance of the products and services we purchase	Seek and report on green lending opportunities that meet Comerica's credit standards
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CLIMATE CHANGE IMPACTS

Since 2007, we have annually disclosed our emissions reduction strategy and efforts through the CDP's climate change questionnaire. We have been recognized by CDP for our performance and leadership seven times. See our [2021 CDP Response](#) for more information on our climate change strategy, how the company is impacted by physical and business transition risks, and our recent progress in addressing climate change risks and opportunities. Our CDP Response addresses key elements of the Task Force for Climate-Related Financial Disclosure (TCFD) recommendations. Climate-related environmental data is also included in the [Key Metrics Table](#) in this report. In 2020, we also joined the Partnership for Carbon Accounting Financials (PCAF) and committed to begin publicly disclosing Comerica's financed emissions within three years.

ENERGY & 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. Efficiently managing our energy use is equally important to our bottom line as energy is a significant operating expense. For more details on Comerica's 2020 energy consumption, GHG emissions (Scope 1-3) and reduction initiatives, refer to our Key Metrics Table link below or our [2021 CDP Response](#). Comerica's current location-based, real estate-related GHG goals cover 99% of our overall Scope 1 and 2 GHG emissions with the remaining balance (Scope 1 travel-related emissions) offset using annual verified emissions reductions.

2020 MI BATTLE OF THE BUILDINGS FINANCIAL SERVICES CATEGORY WINNER

Key Metrics

raise your expectations

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

GOAL
ACHIEVED
IN 2013

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

GOAL
ACHIEVED
IN 2016

3rd Generation GHG Goal:
50% Reduction by 2025**

GOAL
ACHIEVED
IN 2020

4th and 5th Generation GHG
Goals: 65% Reduction by 2030
and 100% by 2050**

53%
REDUCTION
AS OF 2020

* Base year 2008; includes Scope 1 & 2 location-based real estate emissions

** Base year 2012; includes Scope 1 & 2 location-based real estate emissions

ENVIRONMENTAL RESOURCE MANAGEMENT

We are committed to managing resources wisely by minimizing operational waste and reducing our water usage.

PAPER

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

WASTE

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

WATER STEWARDSHIP

Water stewardship is important in light of our presence in both water-abundant and water-stressed regions. Our approach continues to focus on using water more efficiently and closely monitoring our water consumption and costs.



as of 2020 vs. 2020 goal of 50%
(2012 baseline)



as of 2020 vs. 2020 goal of 20%
(2012 baseline)



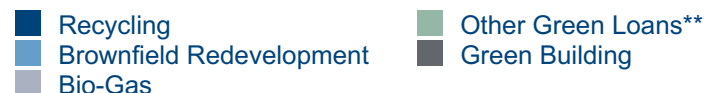
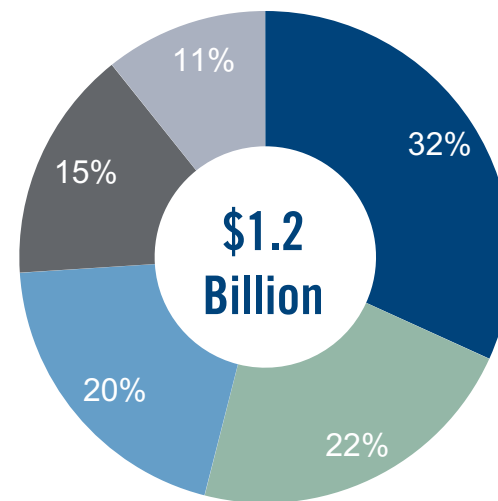
as of 2020 vs. 2020 goal of 30%
(2012 baseline)

Refer to our GRI Index for more details on how the COVID-19 pandemic impacted our management of paper, waste and water.

ENVIRONMENTALLY BENEFICIAL LENDING

At Comerica, we recognize our sustainability influence goes well beyond our own footprint. One of the most impactful things we do is to provide financial services to those businesses driving a more sustainable economy. By working with companies involved in environmentally beneficial industries and projects, we in turn advance issues like recycling, sustainable energy, green buildings and limiting pollution impacts. In 2020, we provided \$1.2 billion in loans and commitments to environmentally-beneficial industries and projects, representing a 29% year-over-year increase. For additional details on our environmentally-beneficial (green) loan procedures, refer to the GRI Index.

*Environmentally Beneficial Loans and Commitments by Category**



* Data as of 12/31/20. The *Other Green Loans* category in this chart includes the following environmentally beneficial loan codes:

- PollutionControl (8%)
- GreenEng/Consult/Eval/Design (4%)
- Other Green Products and Services (3%)
- Wind Energy (2%)
- Vehicle Electrification/Adv. Battery/Fuel Cell (2%)
- Solar Energy (2%)
- Energy Efficiency (1%)

Comerica's 14 Green Loan Categories	
Green Building (New or Retrofit)	Bio-Fuels
Recycling	Bio-Gas
Energy Efficiency	Vehicle Electrification/Battery/Fuel Cell
Brownfield Redevelopment	Smart Grid Technologies
Wind Energy	Pollution Control
Solar Energy	Green Eng/Consult/Eval/Design Services
Geothermal, Wave or Tidal Energy	Other Green Products & Services

Comerica Supports Green Business

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Energy			
Employee Numbers for Intensity Metrics			
Annual Report-based employee FTEs - used for travel intensity-based metrics ¹⁴	9,035	7,747	7,681
Human Resources-based employee FTEs - used for real estate intensity-based metrics ¹⁴	—	7,600	7,536
Total Workers (including employees and contingent workers within our buildings, on FTE basis)- used for real estate intensity-based metrics ¹⁴	—	8,422	8,210
Energy Use (MWh)			
Total direct and indirect energy use- real estate and transport (MWh)	153,210	105,699	95,286
Total direct and indirect energy use- real estate and transport (Billion Joules)	551,556	380,407	343,029
Total direct and indirect energy use- real estate only (MWh) ¹⁵	148,266	102,438	93,662
Direct energy use- fossil fuels (MWh)	30,966	27,646	24,378
Indirect energy use- purchased electricity, steam, chilled water in metered buildings (MWh)	93,779	56,960	53,689
Indirect energy use- estimated electricity use in leased (and unmetered) buildings (MWh)	28,465	13,623	12,048
Energy Intensity			
Total direct and indirect energy use- real estate (MWh) per square foot at year end	0.0267	0.0253	0.0218
Total direct and indirect energy use- real estate (MWh) per square foot - average square feet over four quarters	—	0.0234	0.0216
Total direct and indirect energy use (MWh) per full time employee (FTE)	—	13.90	12.64

¹⁴ Our Human Resources (HR)-generated FTE number uses a slightly different calculation than the Annual Report FTE number and allows us to break down workers by individual locations. This allows for intensity metrics to be generated at the facility level. We use the HR-based FTE number for our real estate-related intensity-based metrics and Annual Report employee FTE for the travel-intensity metrics (from 2020 Annual Report, Page F-116).

¹⁵ Total direct and indirect energy use- real estate only includes Natural Gas, Diesel Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and/or Chilled Water.

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions			
Total GHG Emissions from Scopes 1 & 2 Real Estate and Scope 1 Travel (Metric tons of CO ₂ e)	81,735	42,621	38,354
GHG emissions- Scopes 1 and 2 Real Estate only- (Metric tons of CO ₂ e)	80,533	41,828	37,954
Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end) within organization	0.0145	0.0096	0.0088
Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters) within organization	—	0.0096	0.0088
Percent Cumulative Scope 1 & 2 Real Estate GHG reduction from 2012 base year (Goal= 20 percent GHG reduction from base year by 2020)	—	48	53
GHG emissions- Scope 1 transport only	1,201	793	400
Breakdown by Scope¹⁶			
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	6,304	5,401
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings	74,784	36,316	32,953
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport			
Purchased Goods and Services			
Total lifecycle paper emissions ¹⁷	3,055	4,560	4,758
Life cycle emissions-office copy paper use ¹⁷	1,270	1,662	957
Life cycle emissions-other office paper use ¹⁷	1,563	2,721	3,643
Life cycle emissions-marketing paper use ¹⁷	222	176	159
Total lifecycle computer emissions	520	2,816	1,265
Total lifecycle carpeting emissions	137	504	157

¹⁶ Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its greenhouse gas (GHG) emissions. Specific methodologies for estimating Scope 1, Scope 2, and Scope 3 emissions, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in [Comerica's CDP Climate Change Response](#).

¹⁷ Paper Emissions in 2019-2020 were calculated using Environmental Paper Network Paper Calculator Version 4.0. 2012 Paper Emissions were calculated using Environmental Paper Network Paper Calculator Version 3.2.

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions (Continued)			
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport (Continued)			
Capital Goods			
Total lifecycle furniture emissions	—	989	832
Fuel-and-energy related activities			
Electricity transmission/distribution loss emissions	—	1,708	1,657
Upstream Transportation and Distribution			
Shipping emissions ¹⁸	—	195	—
Armored vehicle emissions	—	69	463
Waste Generated in Operations			
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	505	412
Business Travel			
Employee business travel by air and car	4,431	3,515	1,108
Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE)	—	0.46	0.14
Employee Commuting			
Employee commuting emissions	—	25,837	12,918

¹⁸ We have been informed by our shipping supplier that their emissions reporting platform, which we have used to estimate Comerica's previous years' shipping-related GHG emissions, is not available for estimating 2020 shipping-related emissions.

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions (Continued)			
Downstream Leased Assets			
Total Downstream Leased Assets	1,257	629	419
Subleased metered electricity	726	397	271
Subleased estimated electricity	423	12	10
Subleased natural gas	81	71	65
Subleased steam	28	0	0
Subleased estimated heat-natural gas	—	0	5
Subleased corporate jet emissions	—	149	68
Other Downstream			
CBRE Business Travel on Comerica Account	—	171	241
Comerica Leased Fleet ¹⁹	—	—	84
Real Estate Square Footage (Square feet at year end)			
Total metered and unmetered square feet at year end	5,545,466	4,350,468	4,305,584
Total subleased square feet at year end	137,637	63,375	62,725
Real Estate Square Footage (Average square feet over four quarters)			
Average metered and unmetered square feet over four quarters	—	4,370,816	4,332,328
Average subleased square feet over four quarters	—	66,099	63,178

¹⁹In early 2020, we transferred much of our corporate fleet vehicles from Scope 1 to Scope 3 as we no longer own the vehicles (our security vendor now owns and manages the vehicles).

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Environmental Resource Management			
Waste			
Landfilled employee waste (short tons)	2,086	1,455	1,332
Percent Cumulative reduction from 2012 base year (Goal=20 percent Landfilled Waste Reduction by 2020)	—	30.3	36.1
Total recycled/re-purposed waste (short tons)	3,372	2,184	1,423
Recycled office paper	3,108	1,928	1,212
Recycled/repurposed electronic equipment	149	87	42
Recycled operational waste	110	154	157
Recycled cardboard bailer waste	—	3	1
Recycled pallets	—	2	8
Universal waste	3	10	3
Total waste diverted from landfill (Percent)- including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste	62	60	52
Paper			
Total paper consumption (tons)	1,266	602	607
Office copy paper consumption (tons)	560	245	140
Other office paper consumption (tons)	618	336	447
Marketing paper consumption (tons)	88	22	20
Paper Intensity metrics (pounds consumed per FTE)			
Total office paper (office copy and other office paper) consumption in pounds per FTE	—	152.72	172.51
Office copy paper consumption in pounds per FTE	—	64.38	76.70
Percent Cumulative reduction from 2012 base year (Goal=50 percent Office Copy Paper Reduction by 2020)	—	56.3	75.0

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Environmental Attributes of Paper			
Total FSC-certified office paper (Percent of total)	47	43	24
Total FSC-certified marketing paper (Percent of total)	64	100	100
Office copy paper \geq 30 percent post-consumer recycled content (Percent of total office copy paper)	97	96	95
All other papers (excluding office copy paper) \geq 10 percent post-consumer recycled content (Percent of total papers except office copy paper)	14	9	26
Total post-consumer recycled content by weight (Percent of total paper consumption)	14	13	7
Water Stewardship			
Total water consumption (cubic meters) ²⁰	451,532	301,369	298,125
Intensity metric- Water consumption (cubic meters per Total Employee FTE)	—	39.65	39.56
Intensity metric- Water consumption (cubic meters per Total Worker FTE)	—	35.78	36.31
Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020)	—	33.3	34.0
Environmentally-Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)			
Loan commitments (Billions \$)	1.0	0.9	1.2
Loan commitments (number of companies)	127	82	120

²⁰ Our “direct billed” water consumption includes all properties for which Comerica receives and pays water bills directly via our utility bill payment and management system. Leased properties controlled by our landlords are not included in these totals.

KEY METRICS TABLE

ENVIRONMENT	2012	2019	2020
Supplier Sustainability Engagement			
Percentage of top spend screened every three years for environmental sustainability	30	39	39
Percent of spend dollars with suppliers screened for sustainability with a score of A through C	—	55	66
Percent change in average sustainability score of suppliers (Round 3 scoring vs. Round 2 scoring)	—	-1	-1
Percentage of carpet purchases that were NSF 140 Gold rated ²¹	99	100	100
Percentage of flooring purchases, including carpet and vinyl flooring, that were Cradle-to-Cradle silver certified ²¹			
Percentage of flooring purchases, including carpet and vinyl flooring, that contained recycled content ²¹	—	97	86
Percentage of computers and displays purchased that carried an EPEAT rating ²²	—	99	100
Percentage of furniture purchases that were BIFMA level® certified ²³	—	83	94
Percentage of office supplies purchased from Office Depot that contained post-consumer recycled content	—	18	19
Percentage of office supplies purchased from Office Depot that were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System	57	24	24

²¹ Inclusive of Shaw purchases, representing 95% of all 2020 flooring purchases.

²² EPEAT certified computers/displays for 2020 (39.4% silver and 60.3% gold)

²³ 2020 data not directly comparable to 2019 as purchase and BIFMA certification data was not available from all 2020 furniture vendors.