

## Voluntary Carbon Market Disclosures Act Disclosure

Comerica understands that protecting and preserving the environment is important to the health and well-being of the people, businesses and communities we serve. As such, we are committed to incorporating environmental stewardship considerations into the ways we do business. We believe that the adoption of environmentally responsible practices will help us to become a stronger and more successful company and will enable us to create greater long-term value for our stakeholders – our investors, customers, colleagues, suppliers and communities.

Comerica acknowledges climate change is playing an increasingly significant role in business and society at large. We also recognize the financial sector plays a unique role in addressing the changes needed to adapt to a changing environment while supporting more resilient communities. As such, Comerica's key climate-related priorities are:

- Supporting our customers
- Integrating climate into our business
- Reducing our emissions footprint

California's Voluntary Carbon Market Disclosures Act requires disclosures from companies regarding their interactions with voluntary carbon markets and associated claims made with respect to reductions in greenhouse gas emissions.

Comerica does not currently make claims regarding the achievement of net zero emissions, claim a product is "carbon neutral," or make other claims implying Comerica does not add net carbon dioxide or greenhouse gases (GHG) to the atmosphere. Comerica has not made significant reductions to its net carbon dioxide or greenhouse gas emissions using voluntary carbon offsets.

Comerica does purchase small quantities of voluntary carbon offsets. The voluntary carbon offsets are used to offset the emissions associated with Comerica's Scope 1 travel emissions; however, Comerica does not currently use the offsets to claim a reduction in Scope 1 emissions. Additional details regarding Comerica's use of voluntary carbon offsets with respect to our 2022 GHG emissions are provided on pages 98-100 of our [2023 CDP Climate Change Questionnaire Response](#).

Comerica publicly stated GHG reduction goals as follows:

- 50% reduction by 2025
- 65% reduction by 2030
- 100% reduction by 2050

These goals are for Scope 1 and Scope 2 (location-based) emissions relative to a 2012 baseline. As of year-end 2022, Comerica has reduced these operational emissions approximately 57% from our 2012 baseline. These goals are not indicated to support claims of carbon neutrality, net zero emissions, or other science-based GHG reduction targets. It should also be noted that voluntary carbon offsets purchased by Comerica are not currently used to reduce our overall reported Scope 1 and Scope 2 (location and market-based) GHG emissions or factored into our reported progress on our GHG reduction goals.

This disclosure is based on GHG emissions information published in [Comerica's 2022 Corporate Responsibility Report](#), [2023 CDP Climate Change Questionnaire Response](#) and [2023 TCFD Report](#) which all reflect GHG emissions through 12/31/2022. These referenced documents contain the methodologies, assumptions and other information used to support our GHG emissions reporting and progress against our stated emissions reductions goals. Comerica's Scope 1, 2 and 3 GHG emissions are externally verified by a third party at the limited assurance level, as detailed in the respective [GHG Emissions Verification Declaration](#). Comerica will provide updated information as required under California's Voluntary Carbon Market Disclosure Act no less than annually. Comerica invites you to learn more about our approach to Sustainability at [Comerica.com/sustainability](https://www.comerica.com/sustainability).