



2015

Comerica Sustainability Progress Report

Comerica Bank[®]

The photograph used on the cover of this report was taken by our colleague, Walter T. Galloway, from Comerica's Enterprise Risk Department, and submitted as part of an Earth Day employee photo contest organized by our Dallas/Ft. Worth Green Office Team.

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Sustainability at Comerica

809,000 POUNDS 

of paper securely shredded and recycled at Comerica community shred events in 2015

7%

increase in average supplier sustainability scores from 2012 to 2015

64% 

increase in supplier diversity spend from 2014 to 2015

\$10.5 MILLION value of community impact from Comerica volunteers since 2006

PERFECT 100 

Comerica's score for climate disclosure to CDP in 2015 and our 5th listing on the CDP Climate Disclosure Leadership Index (CDLI)

 **\$919** MILLION

of green loans and commitments in 2015 to companies in 13 different categories

 **\$8.8** MILLION

of corporate philanthropic contributions to organizations in the communities we serve in 2015

80%

of Comerica colleagues enrolled in our Master of Diversity Awareness program as of 2015

 **906**

financial literacy training events sponsored by Comerica in 2015, reaching over 36,000 low- and moderate-income individuals



Decoupling environmental impacts from economic performance by reducing emissions, water use, waste to landfill, and paper use while gross revenues increased 8% in 2015

Progress on 2020 Environmental Goals vs. 2012 Baseline

16%
REDUCTION
IN GREENHOUSE GAS
EMISSIONS FROM
REAL ESTATE

as of 2015 vs.
2020 goal of 20%

24.8%
REDUCTION
IN WATER
CONSUMPTION

as of 2015 vs.
2020 goal of 30%

24.1%
REDUCTION
IN WASTE TO
LANDFILL

as of 2015 vs.
2020 goal of 20%

**GOAL
ACHIEVED!**

26.7%
REDUCTION
IN OFFICE COPY
PAPER USAGE

as of 2015 vs.
2020 goal of 50%

Visit www.comerica.com/sustainability to view Comerica's 2015 Sustainability Progress Report, including the sources of data listed above and more information on our sustainability efforts.



ABOUT THIS REPORT

Comerica's 2015 Sustainability Progress Report provides an update on our results for the period January 1 to December 31, 2015. Every two years, Comerica produces a comprehensive sustainability report based on the Global Reporting Initiative (GRI) framework. Our most recent GRI-G4-based 2014 Comerica Sustainability Report was issued in 2015. The focus of this report is to update our environmental sustainability progress since our 2014 report.

While the focus of our 2015 Sustainability Progress Report is on environmental sustainability, we have also included key non-environmental metrics including economic, social, and governance topics within our [Key Statistics Table](#) at the back of this report. We have also included an updated [GRI Content Index](#) which references the location of key data in both this report and our previous GRI-G4 report. Our next GRI-based report will be published in mid-year 2017 to communicate our 2016 progress.

In addition to GRI, Comerica also acknowledges other sustainability reporting guidelines including those outlined by the Sustainability Accounting Standards Board (SASB) Financials sector standards and aspirational guides such as the United Nations Sustainable Development Goals. While not specifically designed to meet other reporting frameworks, the information presented in this report addresses some of the requested disclosures for the SASB Financials sector standards. Comerica will continue to monitor additional sustainability reporting guidelines for our future sustainability reporting efforts.

We follow the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard (Revised Edition) to account for and calculate Scope 1 and 2 greenhouse gas (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 our Scope 3 GHG emissions. We obtained independent, third-party verification (level: limited assurance) for our 2015 Scope 1, Scope 2, and Scope 3 GHG emissions. A copy of the verification letter and details on Global Warming Potentials (GWP) and emission conversion factors used in our 2015 emissions reporting are included in the [2016 Comerica Incorporated CDP Response](#) (herein referred to as our 2016 CDP Response).

While this report is focused on our six environmental Impact Topics, we recognize that these topics are intertwined with other economic, social and governance topics, although they are not explicitly discussed in this environmentally-focused progress report. A detailed discussion of Comerica's approach to the management of the company's Impact Topics, consistent with GRI-G4 guidance, is included in the [2014 Comerica Sustainability Report](#). In this progress report, we note — in the sections that discuss our Impact Topics — whether there was any change in the management approach to those Impact Topics since the 2014 report was prepared.

Please review this report and share your candid feedback on our sustainability performance. By sharing your thoughts, you can help us to improve our performance and further raise your expectations about what a bank can be. To find out more about sustainability at Comerica or to provide feedback on our reporting, please contact: J. Scott Beckerman, Senior Vice President and Director of Corporate Sustainability, jsbeckerman@comerica.com.

OUR COMPANY

Company Profile

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and is among the 25 largest financial holding companies in the United States. For over 166 years, our colleagues have focused on building long-term relationships, and helping people and businesses be successful. We deliver the highest quality financial services and are strategically aligned into three business segments:

- **The Business Bank**, supporting companies with an array of credit and non-credit financial products and services
- **The Retail Bank**, delivering personalized financial products and services to small businesses and individuals
- **Wealth Management**, serving the needs of high net worth clients and institutions.

Our key markets are Texas, Arizona, California, Florida, and Michigan, with select businesses operating in several other states, Canada, and Mexico. At year end 2015, Comerica served over one million customers.

Our total assets stood at approximately \$71.9 billion, total loans (net of unearned income) at approximately \$49.1 billion, and total deposits at approximately \$59.9 billion as of December 31, 2015. Additional financial and non-financial sustainability-related metrics are provided in the [2015 Key Statistics Table](#) attached to this report and in [Comerica's 2015 Annual Report](#). For more information about our company, please visit the [Company Overview](#) section of our website.

<i>Comerica At A Glance: 2015</i>	
476 U.S. banking centers: 214 in Michigan, 133 in Texas, 103 in California, 19 in Arizona and 7 in Florida; and 637 ATMs	Among the top 10 lenders for the Ex-Im Bank Working Capital Guarantee Program
8880 employees (full-time equivalents) in 604 Comerica office locations nationwide	Located in seven of the 10 largest cities in the U.S.
#2 pre-paid commercial card issuer in the U.S.	Highest percentage of Commercial and Industrial Loans among the top 25 U.S. financial holding companies ¹

¹Based on data provided by SNL Financial for commercial and industrial loans outstanding as a percentage of assets, as of December 31, 2015.

The Comerica Promise

In our 2014 Sustainability Report, we shared **The Comerica Promise**, an employee roadmap aligned with our vision and mission, to elevate the way we work with our customers and each other. **The Comerica Promise** includes a Customer Promise and a Colleague Promise — statements that describe the behavioral principles and values that define our culture and align with our codes of conduct. Comerica's seven Core Values are instrumental to fulfilling this promise and define how we live our Core Values and how our customers benefit from our actions.

<i>Vision</i>	<i>Mission</i>
<i>Comerica's vision is to become the highest performing, most respected, and most desired bank in the communities we serve.</i>	<i>Comerica's mission is to achieve balanced growth and profitability by delivering a higher level of banking that nurtures lifelong relationships with unwavering integrity and financial prudence.</i>

We illustrate how **The Comerica Promise** and our Core Values of **Customer-centricity, Collaboration, Integrity, Excellence, Agility, Diversity, and Involvement** deliver sustainability progress by providing examples in the following table.

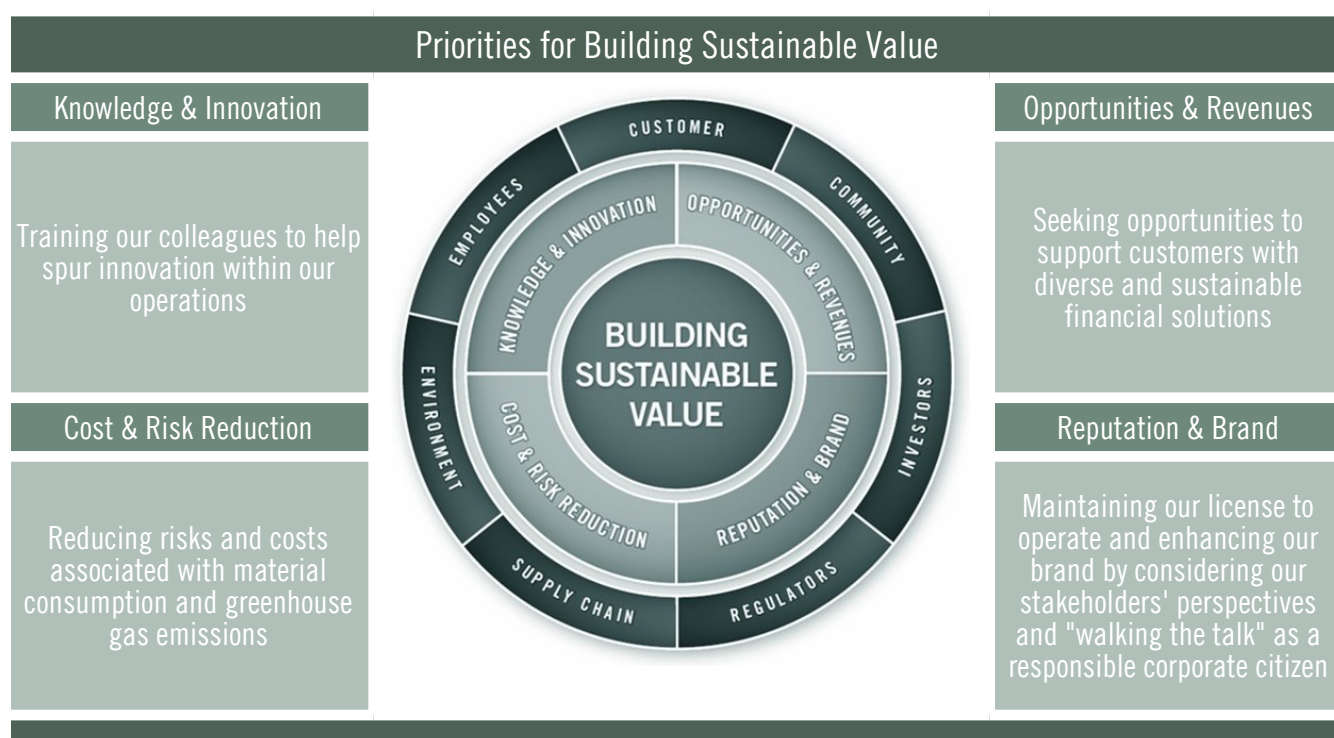
<i>Our Core Values</i>	<i>How we will act</i>	<i>Examples of how we live our values through Sustainability</i>
<i>Customer-centricity</i>	Our decisions will be based first and foremost on what is best for our customers, be they internal or external.	Our loans and commitments classified as "green" support our customers in a greening economy, as described in the Environmentally Beneficial Lending section.
<i>Collaboration</i>	We will work as a team to do what is right by our customers and our colleagues.	Bringing a sustainability focus to the supply chain by engaging our suppliers to be more sustainable companies and support our sustainability efforts, as described in the section Engaging with Suppliers .
<i>Integrity</i>	We will maintain the highest ethical standards through our honesty and transparency. We will honor our commitments and take personal responsibility for our actions.	Our commitment to current and future generations is revealed through our transparent disclosures of our approach to climate change and GHG emissions as described in the GHG Emissions section.
<i>Excellence</i>	We understand there are no trade-offs or short cuts on the road to success. We will strive for greatness through continuous self-improvement.	We set goals and hold ourselves accountable. See how we've progressed in meeting our environmental sustainability goals on reducing emissions, water, waste, and paper consumption in the section on our Environmental Performance .
<i>Agility</i>	We aspire to become a company that fully embraces innovation as a means of driving ongoing growth and prosperity. We remain flexible and adaptable to change.	Innovation comes in many forms and delivers results like our win in the Michigan Battle of the Buildings competition. A combination of innovative building controls and colleague engagement are summarized in this highlight in our section on Energy .
<i>Diversity</i>	We will create an environment that celebrates the differences among our colleagues and customers, with the understanding that such differences make us a stronger company.	Though the focus of this report is on our environmental progress, we provide detailed metrics on our diversity performance in a number of categories in the Key Statistics Table
<i>Involvement</i>	We embrace our critical role in the communities we serve and acknowledge that our success is intertwined with theirs. We will make sustainability a priority.	Sustainability is certainly a priority for our Green Office Team members. Learn more about the commitment of these colleagues in the Engaging Colleagues on Sustainability section.

Our commitment to "Raising Expectations" and supporting our Core Values is evidenced by awards and recognitions from a wide array of organizations.

<i>Key 2015 Awards and Recognition</i>	
Ranked #6 among customers in the 2015 <i>American Banker</i> /Reputation Institute survey of bank reputations	Corporate Social Responsibility Leadership Award from the Financial Services Roundtable
The prestigious Lawrence R. Klein award presented to Comerica's Chief Economist, Robert A. Dye, for the most accurate U.S. economic forecasts from 2011-2014	MBN USA named Comerica to its annual Corporate 101 list, which represents the "Most Admired Companies" in supplier diversity
Received 8 national and regional 2015 Greenwich Excellence Awards for Comerica Middle Market Banking	Ranked in <i>LATINO Magazine's</i> 2015 "LATINO 100" list as one "of the top 100 companies providing the most opportunities for Latinos"
Perfect 100 disclosure score for CDP on Comerica's climate change response and 5th listing on CDP's Climate Disclosure Leadership Index	7th consecutive year on FTSE4Good Index and continued listing on Thomson Reuters Corporate Responsibility Indices
One of <i>Latino Style's</i> "Top 50 Companies for Latinas to Work"	Ranked #2 in <i>DiversityInc's</i> Top 10 Regional Companies for Diversity
2015 Winner of Michigan's Battle of the Buildings energy challenge (office building category) for largest reduction in energy consumption at our Stadium Pauline location in Ann Arbor, Michigan (2015 vs. 2014)	Innovation in Financial Education Award presented by Nasdaq and the EverFi Corporation for Comerica's financial education initiatives within our communities
2nd consecutive <i>Supply & Demand Chain Executive Magazine's</i> Green Supply Chain Award for our work on supplier sustainability	100 percent rating on the <i>Human Rights Campaign</i> Corporate Equality Index, a national benchmark of LGBT workplace equality
One of <i>Black Enterprise Magazine's</i> 40 Best Companies for Diversity	Selected as one of WE USA's Corporations of the Year for Comerica's supplier diversity efforts

SUSTAINABILITY AT COMERICA

Sustainability can be viewed as an application of the 'golden rule' over time: treating future generations as we would like to be treated. At Comerica, we recognize our success and the success of our stakeholders is tied to the prosperity and well-being of the people, businesses, and communities we serve both now and in the future. We depend on sustained access to the natural resources provided by a flourishing environment and the social and human resources provided by healthy and vibrant communities. Our approach to protecting and preserving the environment while enhancing human and social capital of the communities in which we do business is embodied by our value creation approach to sustainability.



Comerica's overall approach to sustainability remains consistent with what we describe in our [2014 Comerica Sustainability Report](#) where we provide a detailed evaluation of the interconnected nature of environmental, economic, social, and governance topics. Yearly Sustainability Action Plans, developed by our Sustainability Council, continue to direct our progress across a broad range of relevant topics using our value creation approach. The Sustainability Office continues to report annually to Comerica's Board of Directors (Board) through its Enterprise Risk Committee.

The table on the following page outlines some of our key sustainability Challenges and Progress for 2015.

<i>Key Progress and Challenges</i>	
2015 Progress	Progress on reducing our energy, waste, water and paper consumption in line with our 2020 goals; including meeting our waste reduction goal four years ahead of schedule.
	Finding new ways to engage with our colleagues using initiatives like our new Master of Sustainability Awareness program.
	Our highly successful Shred Days throughout our key market locations, which help protect against identify theft, recycle thousands of tons of paper, and support community non-profit partners.
2015 Challenges	The impact of the prolonged low interest rate environment and increased regulatory compliance costs has limited the resources we have available to drive more aggressive reductions in our environmental footprint.
	Finding highly impactful methods to deploy our sustainability knowledge to enhance our relationships with customers.
	Although our overall water usage declined, relief from drought conditions in some geographies resulted in a partial rebound in water usage.

2020 Environmental Sustainability Goals

In 2014, after having achieved our first GHG reduction goal one year early, we developed new and expanded environmental sustainability goals. Our baseline was set at 2012, the time at which our real estate portfolio expanded to its approximate current size and scope. Our new goals were formally launched on Earth Day 2015 and included waste, water, and office copy paper reductions in addition to our goal for GHG emissions reduction to further shrink our footprint by 2020.

<i>2020 Environmental Sustainability Goals</i>	
	50% reduction in office copy Paper consumption
	30% reduction in Water use
	20% reduction in greenhouse gas Emissions
	20% reduction in Waste sent to landfill

Our GHG emissions goal covers our Scope 1 and Scope 2 real estate emissions. We evaluated science-based goal setting methodologies, in addition to our corporate strategies, in developing the GHG reduction goal. We recognize science-based goal setting is an evolving practice, particularly for the financial services industry, but we believe our GHG reduction goal is generally in line with the science-based targets required for limiting global climate change. Additional detail is provided in the [Environmental Performance](#) section of this report.

Relevancy Assessment

Beginning in 2014 and extending into 2015, Comerica worked through a robust stakeholder engagement process to evaluate "materiality" as used in the GRI sustainability context (what we refer to as "relevancy," "significance," and "impact"), and to guide preparation of our first GRI-G4 based report published in 2015. We use the terms "relevancy," "significance," and "impact" to refer to those topics that reflect the environmental, economic, social, and governance issues most important to Comerica and our stakeholders; what the GRI Sustainability Reporting Guidelines define as "Material Aspects." 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.

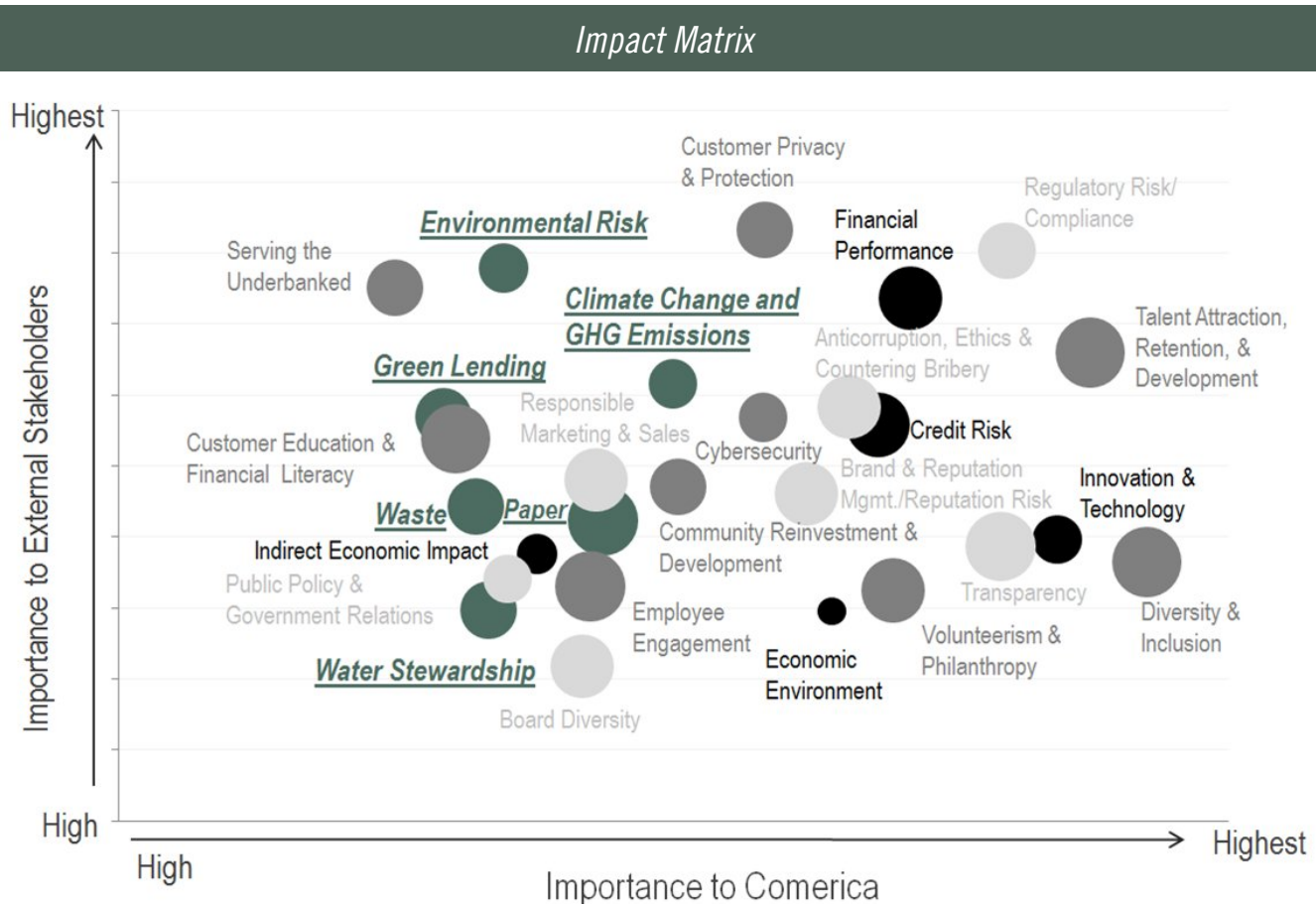
From our stakeholder engagement process, we defined Impact Topics related to environmental, economic, social, and governance issues determined to be most relevant and significant to both internal and external stakeholders. Our Impact Assessment process is described in detail in our [2014 Comerica Sustainability Report](#).

As the focus of this report is on our environmental topics, our six environmental Impact Topics are listed below and discussed in detail in the balance of this report. The table also lists relevant GRI Aspects, and additional information can be found in our updated [GRI Content Index](#). In the balance of this report, the Impact Topic of "Climate Change, Energy, and GHG Emissions" has been split into individual components to provide deeper insights into each of these three subtopics.

<i>Environmental Impact Topics</i>	<i>Relevant GRI Aspect(s)</i>	<i>Boundary</i>				
		<i>Comerica</i>	<i>Communities in our Key Markets</i>	<i>Customers</i>	<i>Investors</i>	<i>Suppliers</i>
Climate Change, Energy, GHG Emissions	Energy	✓	✓	✓	✓	✓
	Emissions	✓	✓	✓	✓	✓
	Compliance	✓	✓	✓	✓	✓
	Transport	✓	✓	✓	✓	✓
Green Lending	Social/Product Responsibility: Product Portfolio	✓		✓	✓	
Paper	Materials (e.g., Paper)	✓		✓		✓
Waste	Effluents and Waste	✓		✓		✓
Water Stewardship	Water	✓		✓		✓
Environmental Risk	Social/Product Responsibility: Product Portfolio	✓	✓	✓		
	Social/Product Responsibility: Audit	✓	✓	✓		

Our Impact Matrix

Our Impact Matrix (first published in our [2014 Comerica Sustainability Report](#)) reflects our understanding of the relative significance of sustainability issues that most affect our business and our stakeholders. The Impact Matrix also provides insight on those topics over which we can have the greatest influence. Based on ongoing interactions with our stakeholders, we believe our Impact Topics and Impact Matrix remain generally consistent with our priorities and those of our stakeholders.



Note: The Impact Matrix only includes those topics that rose to at least a high level of importance with Comerica and our stakeholders.

Impact Topic Categories:

- Environmental
- Economic
- Social
- Governance

Opportunity for Action (bubble size):

- Highly Actionable
- Moderately Actionable
- Low Actionability

As our approach to value creation relies on stakeholder input, Comerica continues to engage with a broad section of our stakeholders on an ongoing basis. By communicating with and listening to our stakeholders, we strengthen our business performance and build enduring sustainable value. The Impact Matrix continues to act as a guide both in communicating our progress on these topics, and in further aligning our corporate priorities with the sustainability issues most relevant to our business.

Q&A with Comerica's Service Company Sustainability Leaders

At Comerica, our internally focused colleagues that manage the non-customer facing aspects of our business are part of what we call the Service Company. This dedicated team of colleagues handles our technology, real estate, purchasing and more.

			
Scott Beckerman	Mike Lawson	Amy Pillivant	Gloria Oldani
Director of Corporate Sustainability	Business Services Group Director	Real Estate and Security Director	Procurement Director

Comerica's Director of Corporate Sustainability, Scott Beckerman, sat down with some of our Service Company leaders to talk about their experiences with sustainability.

You've all been members of Comerica's Sustainability Council for a number of years. In your view, how has sustainability changed since the launch of our Sustainability Program in 2008?

- **Mike:** *Certainly the maturity of our program has advanced since 2008. We have more initiatives of a substantial nature and we measure ourselves much more effectively at this point. The team and Sustainability Council is larger now, and we have seen grass roots programs spring up across the organization, which is indicative of the care our colleagues have for our environment and for Comerica's role in it.*
- **Amy:** *We've also really refined our program over the years. We set our first goal back in 2009 with very little historical information. Since then, our systems for measuring and managing our impacts have improved, along with the level of engagement from our colleagues. So not only did we achieve our first goal early, but we were able to set new goals and did so with a better perspective on where we have been and where we want to go.*
- **Gloria:** *When our corporate sustainability initiative was launched, it felt like a bit of an anomaly, since our procurement focus at that time was all around price. What we found was that sustainability initiatives help drive savings. Creating a sustainable purchasing program raised the level of awareness across the company about paper usage, waste, and other areas where inefficiencies could be reduced. We also found more sustainable products in the market place that were readily available at the same prices. This really rallied people around sustainability.*

As you look at the progress we've made on our 2020 Goals, what surprises you or where do you think we have challenges?

- **Mike:** *Initially the goals and measures we have set seem difficult to achieve, in light of the headwinds that our industry has faced. That said, I am surprised and pleased that we have, in nearly every case, exceeded our goals and by a substantial margin. I believe it underscores the power of priority and focus. Staying focused on Sustainability will be both an ongoing challenge and opportunity.*

- **Amy:** *The biggest surprises to me were the support and advocacy that we have at the bank for sustainability and the true partnership that many departments have had in its overall success. I think our biggest challenges are not that we don't want to do the right thing, but it is prioritizing our projects. We wish we had the resources to do everything at once, but we recognize we need to make choices and focus our resources on the largest contributors to positive change.*

Gloria, as you lead our procurement efforts, how has sustainability become embedded in what you do? How have suppliers stepped up to support our sustainability efforts?

- **Gloria:** *Sustainability is important to Comerica at every level, including the partners we buy from. It has become rooted into our purchasing practices both at the request for proposal stage and with our existing suppliers as part of their ongoing business reviews. Our suppliers have demonstrated that they too have enhanced their efforts to identify opportunities to expand sustainable products and deliver services in more sustainable method. We are dedicated to working together with our suppliers to determine where new strategies can be put in place to meet a common goal.*

Amy, when you look at our real estate portfolio, where have you seen some of the biggest impacts?

- **Amy:** *Since 2009, we've used our RaCC (Rationalize, Consolidate and Close) strategy to refine our workplace standards and allocations of space. By proactively managing our occupancy and reducing our square footage of real estate, we've driven down the emissions associated with our buildings. We expect this strategy will continue to evolve as we think closely about how we occupy real estate, which will in turn help drive further reductions in our environmental footprint.*

Mike, as you look to the future, what role will sustainability have?

- **Mike:** *For larger companies like Comerica, I don't see the importance of social responsibility, including sustainability, fading any time soon and hopefully not ever. And that's not just because it is on someone's agenda in Washington, but because it is becoming, and really is already, an important part of what our customers demand from us. Millennials will become the dominant market force in the coming years and are already exerting significant influence on commerce and the workplace. They think differently than previous generations and really care about the environment and the integrity of the companies they buy from. I believe that sustainability will become a more integrated part of how we do business and how we frame ourselves as a company.*

Scott: Thanks for sharing your thoughts with us and thank you for all your efforts to make Comerica a more sustainable company!

ENVIRONMENTAL RISK MANAGEMENT

Impact Topic | Environmental Risk

At Comerica, we work to reduce the environmental risks of our own footprint as well as the footprint of our customers. Our priorities in this area include reducing environmental sustainability risks from our operations as well as managing environmental issues in real estate-based commercial lending. The management of the company's operational environmental risks associated with resource consumption and climate risks is discussed further in the [Climate Change](#) section of this report and in the [2016 CDP Response](#). The management of environmental-related credit risks associated with loans secured by real estate is discussed below.

Real Estate-Based Environmental Risk Management

In addition to the environmental risks and compliance obligations associated with the properties we operate, Comerica has long been a leader in managing the environmental credit risks related to the loans we provide customers. Our team of experienced environmental professionals in the Environmental Risk Management (ERM) Group work to identify, evaluate, and minimize potential environmental risks to our business associated with loans secured by real estate. This group, based in our corporate Credit Department, manages risks associated with the properties we finance consistent with the Federal Reserve System and Federal Deposit Insurance Corporation guidelines requiring lending institutions to have policies and procedures in place to manage environmental risk.

In 2015, the ERM team evaluated roughly 1,000 sites associated with loans totaling approximately \$9.5 billion. Our current approach to the management of environmental risk in our lending operations is described in more detail in our [2014 Comerica Sustainability Report](#).

Sustainability Highlight: Facilitating Safe Reuse Through Environmental Management

Carefully evaluating and managing environmental risk issues helps Comerica ensure that our borrowers are safely putting underutilized properties back into productive reuse. As a long-term leader in understanding brownfield redevelopment, Comerica helps our borrowers appropriately redevelop challenging properties.



Understanding environmental risk issues allows us to efficiently assess and manage difficult properties, helping to reduce our risks, our borrower's risks and safeguard the environment.

- When a borrower knew of contamination at an industrial site but still wanted to close quickly on an acquisition, we worked to review site closure plans and reserves to ensure the cleanup was conducted over the course of our loan.
- An existing waterfront brownfield site had significant restrictive covenants related to long-term contamination. We worked with our customer to understand their redevelopment plans and ensure they fit within the institutional controls used to safely manage the pre-existing contamination.
- As a borrower looked to develop a school on a former agricultural site, they needed to assess and safely manage any legacy agrichemicals. Comerica worked with the borrower to see that a sampling plan was utilized to help make sure future sensitive populations at the site wouldn't be exposed to harmful levels of contaminants.

CLIMATE CHANGE

Impact Topic | Climate Change

Environmental Sustainability and Climate Risk

While our approach to how we manage climate change-related business risks and opportunities has not significantly changed over the last year, Comerica recognizes that there are growing concerns about the risks that climate change may pose to the stability of the environmental, social, and economic systems on which human societies depend. We use our value creation approach to sustainability to manage the risks and opportunities that are presented by a changing climate.

Climate risks associated with the impacts of our operations are generally managed through the Corporate Sustainability Office in close partnership with Corporate Real Estate, Procurement, and other internal business units. Our Corporate Sustainability Office evaluates and manages these risks in collaboration with the business units mainly responsible for a given issue, such as Corporate Real Estate or Procurement. Climate related risks include greenhouse gas (GHG) emissions, water use, and waste generation, as well as the procurement of the goods and services needed to operate our business. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight on the management of these issues.

Our [Environmental Policy Statement](#) states our commitment to reduce climate change business risks while identifying new business opportunities that help mitigate the impacts of rising global temperatures. For details on Comerica's climate change management approach, please refer to Page 53 of the [2014 Comerica Sustainability Report](#).

CDP Leadership Recognition (since 2008)



Climate Performance Leadership Index (CPLI)	Listed 2 times (2013 & 2014)
Climate Disclosure Leadership Index (CDLI)	Listed 5 times (2008-2011, 2015)

Since 2007, we have disclosed our emissions strategy and reduction efforts on CDP's climate change questionnaire. In 2015, Comerica received a perfect disclosure score of 100 and made CDP's Climate Disclosure Leadership Index (CDLI); the fifth time being listed on the CDLI. Previously, Comerica was listed on the CDP Climate Performance Leadership Index (CPLI or A Band) for its performance in reducing carbon emissions. As a reflection of the growth and progress in global corporate emissions management, our emissions reductions reported in 2015 were solid, but didn't meet the elevated criteria for CDP's A band requirements. Please see our [2016 CDP Response](#) for more information on our current strategy and recent progress in addressing climate change risks and opportunities.

ENVIRONMENTAL PERFORMANCE

We understand the increasing world-wide demand for natural resources cannot be sustained at current levels without damaging the global ecosystems which provide those resources. Conservation and efficient use of natural resources is a key to a sustainable future. As highlighted in our [Environmental Policy Statement](#), Comerica is committed to adopting responsible behaviors and implementing practices to mitigate the risks associated with the unsustainable consumption of our natural resources.

We track the annual progress of our most relevant environmental sustainability topics, which include GHG emissions, water, waste, paper, environmentally-beneficial (green) lending, environmentally responsible procurement, and sustainability engagement/communication.

Comerica's Long-term Environmental Sustainability Goals

Comerica's long-term environmental sustainability goals continue to be to:

- Reduce corporate impact on the environment from greenhouse gas 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 that we purchase, and
- Seek additional environmentally beneficial lending opportunities that meet Comerica's credit standards.

2020 Environmental Sustainability Goals Performance

In 2009, we set an initial GHG emissions reduction target for our real estate portfolio (15 percent by 2015 vs. 2008) that we exceeded one year early in 2014. We set a new GHG emissions reduction goal at that time for our real estate portfolio as well as goals for three additional focus areas: water, waste, and paper. The following table shows our performance to date measured against these 2020 goals.

<i>Comerica's 2020 Environmental Sustainability Goals</i>			
Reduction in real estate greenhouse gas emissions (2012-2020)	Reduction in water usage in metered facilities (2012-2020)	Reduction in employee waste sent to landfill (2012-2020)	Reduction in office copy paper consumption (2012-2020)
20%	30%	20%	50%
<i>Performance Against Goals (2015 vs. 2012)</i>			
↓16.0%	↓24.8%	↓24.1%	↓26.7%

Impact Topic

Energy

We continue to focus on initiatives to reduce energy consumption within our company-owned buildings. Details on Comerica's energy management approach are provided on Pages 54-55 of the [2014 Comerica Sustainability Report](#).

Key Highlights: 2015 Energy Management Approach

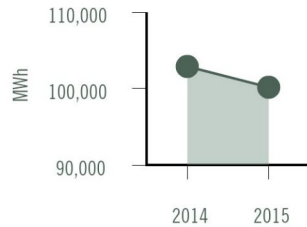
- Development of an equipment standard, which allows for a more consistent approach to energy management; including more direct engagement with our supply chain.
- Completion of energy-efficiency focused site visits for 36 Comerica facilities, including comprehensive energy audits completed for 19 sites and energy efficiency recommendations provided for 17 banking center locations where upcoming renovations are planned.
- Continuation of the Mission Control Team's Comprehensive Management Plan for our data centers, including a new metering project plan to enable sub-metering of the data center power usage and quality.
- Removal of approximately 166,303 square feet (-3.1 percent) of occupied real estate space.

2015 Progress

In 2015, Comerica decreased its direct and indirect energy consumption by 3,612 MWh, or 2.53 percent, compared to 2014, the majority of which was due to lower metered electricity usage. Please review the charts on the following page for additional energy consumption trends for 2015.

Energy Consumption Trends (2015 vs. 2014)

Total Electricity Consumption

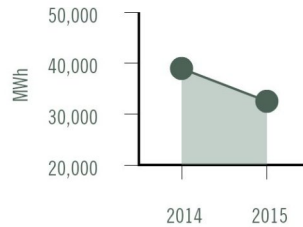


Total 2015 Metered Electricity decreased by 2.61 percent from 2014 and Estimated (Non-Metered) Electricity decreased by 2.75 percent.

This reduction is related to:

- Continuing space rationalization initiatives
- Energy efficiency projects around building management systems
- LED lighting
- New dormant space policy
- Milder weather across the real estate portfolio.

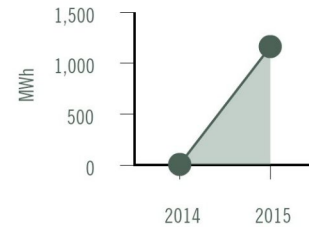
Natural Gas Consumption



Total 2015 natural gas consumption decreased by 6,454 MWh compared to 2014, with 5 Michigan sites contributing 2,463 MWh of the reduction.

These locations had energy efficiency operational improvements implemented during 2015.

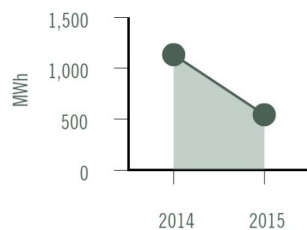
Diesel Fuel Energy Consumption



Diesel Fuel consumption increased by 1,159 MWh during 2015 due to the increased usage of the stand-by electricity generators.

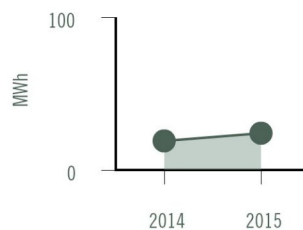
The increase in diesel fuel occurred at a Comerica data center, which needed to run on stand-by electricity generator power for two weeks to carry critical load during system maintenance activities. No extended use of the stand-by generators was needed in 2014.

Steam Energy Consumption



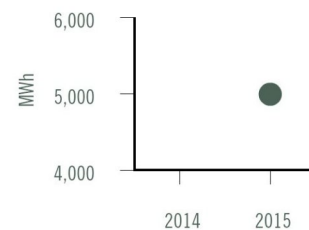
In 2015, our steam consumption decreased by 590 MWh, or 52 percent, from 2014 due to exiting the last metered location that supplied Comerica with steam-generated energy.

Chilled Water Energy Consumption



Our 2015 chilled water consumption increased by 5 MWh, or 26 percent, compared to 2014. However, we only use chilled water at one banking center location, which will be discontinued for 2016.

Estimated Heat Consumption



Estimated Heat is a new activity type for 2015 and includes our two estimated heat sources: natural gas and propane.

We did not report on this metric for 2014, which is why a trend line is not provided.

Sustainability Highlight: Comerica Office Wins Michigan USGBC Battle of the Buildings Challenge



In 2015, Comerica participated for the first time in the USGBC Michigan Battle of the Buildings Challenge and the Energy Star National Battle of the Buildings Challenge. We had 9 locations (5 in Michigan, 2 in Texas, and 2 in California) participate in the National competition and 5 locations participate in the Michigan competition.

The program was a great way to provide tips on water and energy conservation to employees on a building-wide basis. We also audited the operation of these locations and identified suggestions for energy efficiency improvements around technology, operational practices, and occupant behavior.



Representatives from Comerica and our partner CBRE accepting the award in Grand Rapids, Michigan.

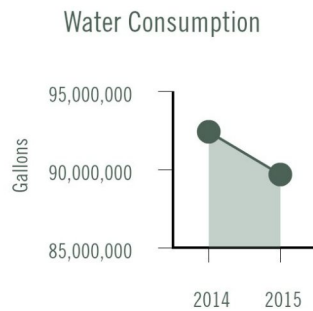
One of the facilities, our Stadium-Pauline location in Ann Arbor, Michigan, won the title of “Biggest Loser” in the Michigan office category by reducing energy use by over 21 percent compared to 2014. Our colleagues in the building worked to reduce energy consumption and our real estate team worked to implement a new building management system (BMS) to improve control of the building's heating and cooling. The success of this site's BMS and awareness of its effectiveness in reducing energy usage and expense has given support to the evaluation of an Enterprise BMS project. Overall, the nine Comerica buildings in the competition together saved a total of 645,044 kilowatt-hours of electricity in 2015.

Impact Topic Water Stewardship

Water Stewardship remains a priority for Comerica, particularly in light of our geographic footprint with locations in both water abundant and water scarce regions. Our management approach continues to focus on using water more efficiently across our building portfolio. In 2014, we committed to reduce water consumption at Comerica's locations by **30 percent by 2020** over a 2012 baseline. Our goal covers locations with water meters that measure actual usage. The total square footage of sites with metered water for 2015 was 3,593,106 square feet. This represents 67.9 percent of the total occupied square footage (average 4 quarters). For details on Comerica's water consumption management approach, please refer to Pages 59-60 of the [2014 Comerica Sustainability Report](#).

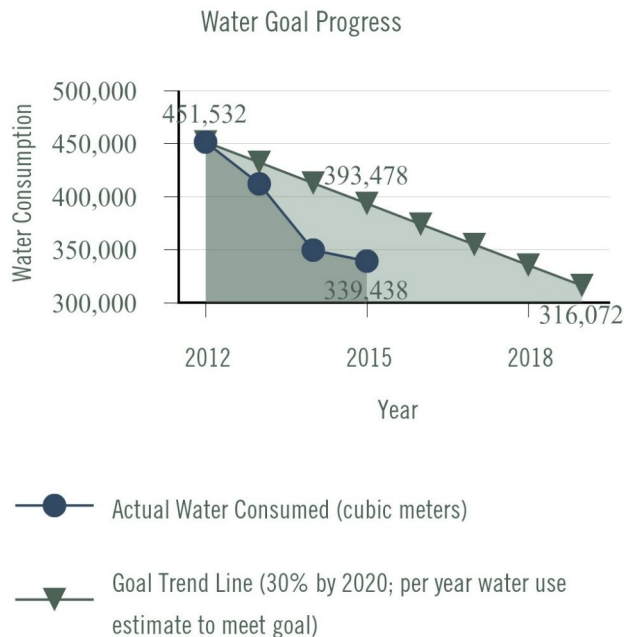
Our focus on water use restrictions increased in 2015, with additional scrutiny on water usage trends on a facility-specific basis, and increased diligence on utility notices regarding changes in water usage. The added focus ensured compliance with local water restrictions, and no violations or fines were reported for 2015.

Water Consumption Trend (2015 vs. 2014)



In 2015, utility-supplied water consumption totaled 89.7 million gallons, a reduction of 2.7 millions gallons (or 3 percent) versus 2014. The Texas region (down 3,100,646 gallons or 8.46 percent) and California region (down 1,317,293 gallons or 28.79 percent) led the way in terms of greatest volume of reductions as these areas experienced drought conditions and a greater emphasis on water conservation through irrigation water usage restrictions. The Weathermatic smart irrigation controls projects have also contributed to Comerica's water reduction, with 14 of the 16 projects located in Texas.

Progress Against our 2020 Water Goal



As of year-end 2015, we have reduced our metered water consumption by 29.6 million gallons of water, representing a 24.8 percent decrease over our 2012 water consumption. The water reduction was due to a combination of factors, including the operation of smart irrigation control systems, increased attention to irrigation system programming and maintenance, and compliance with local utility water use restrictions. We are currently at 83 percent achievement of the goal, with 4 years remaining in the goal period.

For more details on Comerica's 2012-2015 water consumption data, please refer to the [Key Statistics Table](#) in this report.

Our water reductions would have likely been even higher, if not for the following:

The Michigan and Arizona regions saw increased water usage in 2015, with Michigan's total usage up over 1 million gallons (2.39 percent) from 2014. This was due in large part to a water meter at one of our larger campus buildings that was found to be under-reporting water usage and was corrected in the first quarter of 2015. The Arizona region saw a 29 percent increase in water usage compared to 2014. The majority of this increased water usage was due to the addition of a new location, which added over 400,000 gallons to the region's total.

Some of the regions where we have irrigation systems loosened watering restrictions due to increased precipitation events in these areas. This resulted in an increased water usage as sites were allowed to increase duration or frequency of irrigation events. In 2015, Comerica also had to repair irrigation systems that had previously been in a dormant (off) phase due to budgetary restrictions. These locations reported increased water usage as the irrigation systems were brought back into service.

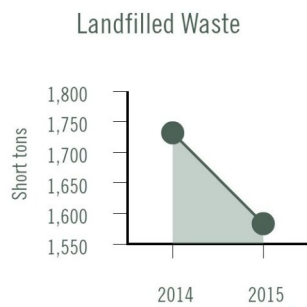
Impact Topic Waste

Waste Management

In nature, waste does not exist: what is a waste for one organism is a resource for another. Reducing waste is a topic that resonates well with our colleagues as they recognize waste as resources out of place. In 2014, we committed to reducing our waste generation to landfill by **20 percent by 2020** over a 2012 baseline. In 2015, we exceeded this goal by reducing our waste to landfill by 24 percent — well ahead of 2020.

Our approach to waste management did not change in 2015 and details on our waste management approach can be found on Pages 57-58 of the [2014 Comerica Sustainability Report](#).

Waste to Landfill Trend (2015 vs. 2014)



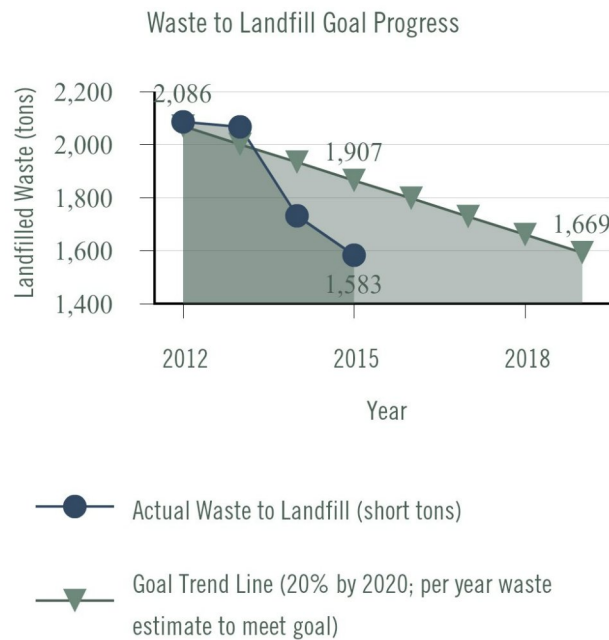
In 2015, we reduced the employee waste sent to the landfill by 149 tons (or 16.9 percent) compared to 2014. Overall, we increased the percentage of waste diverted from the landfill by 2.1 percent over 2014 (64.8 percent diverted). This is due to our continuing waste optimization program to right-size and right-stream our facility waste.

Sustainability Highlight: Reusing Comerica signs during energy efficient lighting upgrades

In recent years, Comerica made a decision to upgrade Comerica's lighted building signs to energy-efficient LED lighting. As part of that project, an effort was made to minimize the amount of metal waste that would need to be scrapped and/or disposed if new signs were purchased. Instead, where feasible, Comerica's Retail and Corporate Real Estate groups worked with our partners at Euko-Design Signs, Inc. to reuse the old sign cabinets and exterior features, but upgraded the interior components to energy efficient LED lights. We have conducted 25 sign conversions as of year-end 2015, resulting in tons of avoided waste. In addition, we've seen energy savings of up to 91 percent in some conversions from neon to LED lighting using our existing sign cabinets.



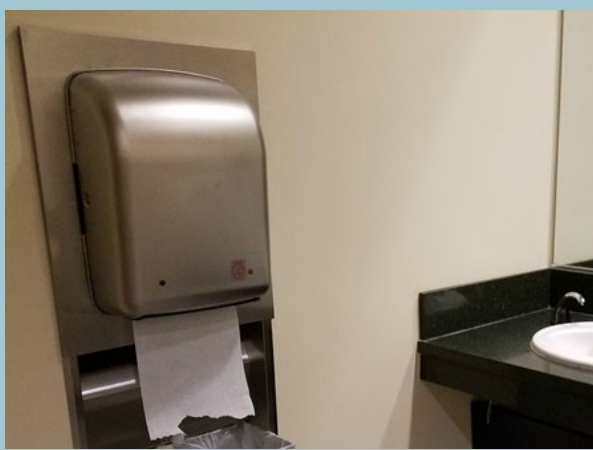
Progress Against our 2020 Goal



From 2012-2015, we reduced our waste to landfill generation by 503 tons, representing a 24 percent reduction. We have met our 2020 goal 4 years early and we are in the process of evaluating next steps regarding our early goal attainment. We are currently at 121 percent achievement of the goal, with 4 years remaining in the goal period.

For more details on Comerica's 2012-2015 waste generation by waste type, please see the [Key Statistics Table](#) within this report.

Sustainability Highlight: Reducing landfill waste one paper towel at a time



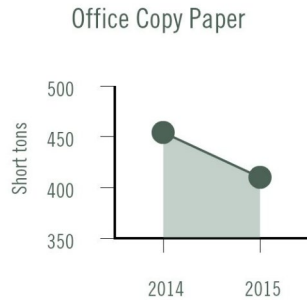
In 2015, we partnered with our supplier, ABM, to implement a program to change out existing towel dispensers with folded towels and toilet tissue dispensers to more efficient options across our Texas, California and Arizona markets. The process began with site audits to verify quantities and types of dispensers and towel/tissue materials currently in use. The program is anticipated to result in less waste generation, less frequent dispenser refills by janitorial staff, less packaging waste, lower costs, and hands free operation for towel dispensers.

While we have not yet realized a full year of operation on the new dispensers, we do anticipate the program to achieve over 7,000 pounds less paper towel and tissue waste for Comerica annually.

Impact Topic Paper

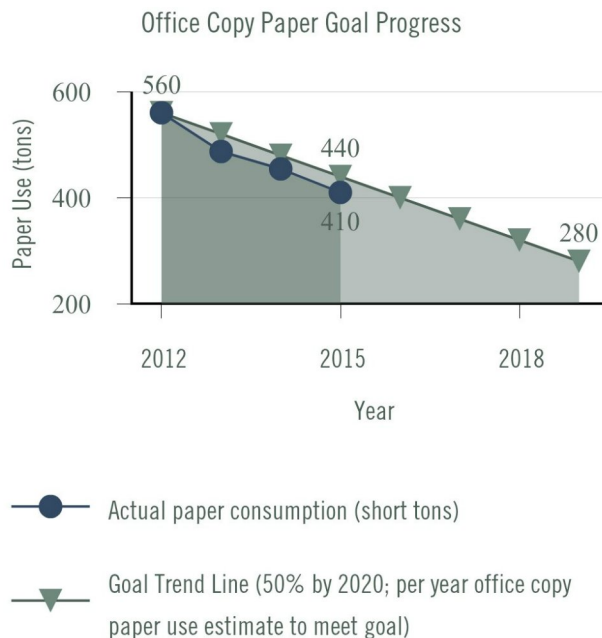
Paper is our largest consumable item used in our operations, so we continue to look for ways to reduce inefficient print processes across Comerica. In 2014, we committed to reducing our office copy paper consumption by **50 percent by 2020** over a 2012 baseline and are making good progress toward that goal.

Office Copy Paper Trend (2015 vs. 2014)



In 2015, we reduced our office copy paper consumption by 43 short tons, or 9.5 percent, compared to 2014. We also saw reductions in our other paper types (other office paper: 16.6 percent decrease; marketing papers: 23.3 percent decrease). Total paper consumption declined by 14 percent in 2015 (vs. 2014).

Progress Against our 2020 Goal



From 2012-2015, we reduced our office copy paper consumption by 150 short tons, representing a 27 percent overall reduction in office copy paper.

The key reductions made during the goal period have been a result of:

- A continuing focus on our managed print services operations,
- Discussions with management on the need to reduce inefficient paper processes,
- 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.

We are currently at 54 percent achievement of the goal, with 4 years remaining in the goal period.

In 2014, we set an office copy paper standard to purchase 30 percent post-consumed recycled (PCR) content and FSC-certified paper, where feasible. Please refer to the following table for 2015 progress on the PCR and FSC content of our purchased papers.

<i>2015 Paper Types</i>	<i>2015 Post-Consumer Recycled (PCR) Content (%)</i>	<i>FSC-Certified Paper (%)</i>
Office Copy Papers	95% of office copy paper contained at least 30% PCR content	98% of office copy paper was FSC-certified
	0.4% decrease over 2014	0.7% increase over 2014
Marketing Papers	98% of marketing paper contained at least 10% PCR content	99% of marketing papers were FSC-certified
	11% increase over 2014	19% increase over 2014
Other Office Papers (rolled paper, statements, envelopes, business cards)	15% of other office papers contained at least 10% PCR content	1% of other office papers were FSC-certified
	9% increase over 2014	1% decrease over 2014

The largest increases in our post-consumer recycled content papers and FSC-certified papers were seen in our Marketing papers in 2015. Other office paper sustainability attributes remain lower compared to our office copy and marketing papers, but we did see a 15 percent improvement in the recycled content over 2014, primarily due to the purchase of some envelopes containing 10 percent PCR content. In 2015, our Green Procurement Work Group worked with our paper and envelope supplier relationship managers to better understand and evaluate the impacts of changing to 30 percent PCR content envelopes. Even with a cost offset from a planned 25 percent reduction in customer statement envelope use, the cost increases for this potential change were not consistent with our expense control requirements resulting from the prolonged low interest rate environment facing the financial services sector.

Sustainability Highlight: Department's change to reduce paper use by one banker box per day



Photo above: 6 months worth of ACH department file storage prior to current project to automate the interactive voice response system process.

Comerica's Automated Clearing House (ACH) Department saw a need to make a change since every time a customer sent a response through the interactive voice response system — which authenticated the user — it generated two printed pages. This resulted in approximately one banker box of paper generated daily. In 2015, the group planned a project to automate and streamline the current manual customer ACH process and is in the process of implementing the project. Over 20 percent of Comerica's current ACH customers have already been converted to the automated process. When this initiative is fully implemented, this process change is expected to eliminate the need to print approximately 4,000 sheets of paper per day and will also eliminate associated printing costs including paper, labor, transportation, storage, and destruction costs.

For details on our paper consumption management approach, which did not change compared to 2014, please refer to Pages 58-59 of the [2014 Comerica Sustainability Report](#). For more details on Comerica's 2012-2015 paper consumption data, recycled and certified content, and intensity metrics, please see the [Key Statistics Table](#).

Impact Topic Greenhouse Gas Emissions

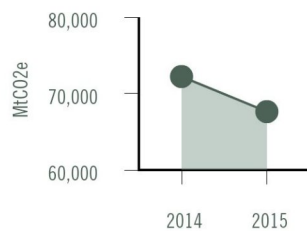
As part of Comerica's [Environmental Policy Statement](#), we pledge to measure, report, and seek to reduce our company's GHG emissions over time. The following sections present our progress on measuring and reducing our GHG emissions by scope, with Scope 1 emissions being direct emissions, Scope 2 emissions associated with our power purchases, and Scope 3 emissions resulting from the goods and services we procure.

Real Estate Emissions (Scope 1 & 2) Progress

We have committed to reducing real estate-related Scope 1 & 2 GHG emissions by **20 percent by 2020** over a 2012 baseline and continue to make solid progress on this goal.

Scope 1 and 2 Real Estate Emissions Trend (2015 vs. 2014)

Scopes 1&2 Real Estate Emissions



In 2015, we reduced our Scope 1 & 2 real estate GHG emissions by 4,611 MtCO₂e, or 6.4 percent, compared to 2014. Comerica's Scope 1 Corporate Real Estate activities (natural gas, diesel, refrigerants) decreased by 900 MtCO₂e in 2015 primarily due to the decrease in natural gas consumption.

Comerica's Scope 2 emissions decreased by 3,711 MtCO₂e in 2015. This was despite the addition of 901.7 MtCO₂e of estimated heat emissions (including estimated natural gas and estimated propane used for heat) that were reported in 2015 to be responsive to the Scope 2 accounting guidance. The reduction in metered and estimated electricity usage were the largest components of the Scope 2 decrease.

The real estate emissions decreases in 2015 were due to in part to the following:

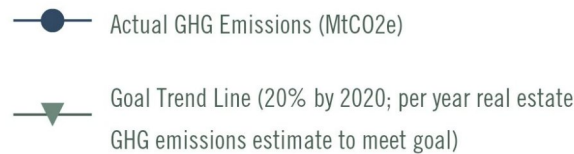
- Comerica's 59 energy and sustainability initiatives implemented in 2015,
- 30 Rationalization, Consolidation, and Closure (RaCC) real estate projects in 2015, and
- Milder weather conditions across our portfolio.

Progress Against our 2020 Goal

Scope 1 & 2 Real Estate Emissions Goal Progress



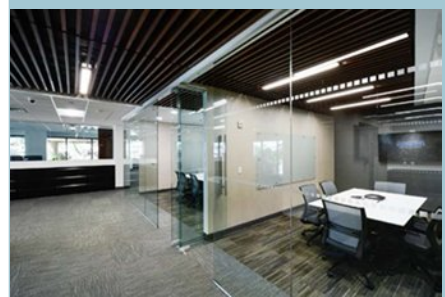
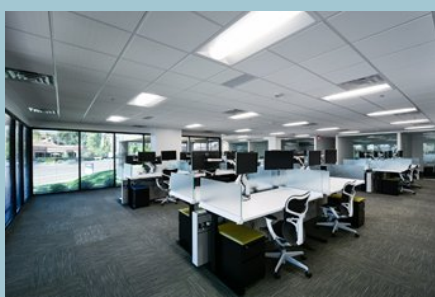
Our 2015 Corporate Real Estate emissions decreased by 4,611 MtCO2e from 2014's total. We have reduced our real estate-related Scope 1 & 2 emissions by 12,898 MtCO2e from the 2012 baseline total of 80,533 MtCO2e. This represents a reduction of 16 percent from the 2012 baseline. We are currently at 80 percent achievement of the goal, with 4 years remaining in the goal period.



Sustainability Highlight: Alternative Work Strategies in our Arizona Market

When it was time to refresh Comerica's Phoenix, Arizona Headquarters, we sought to create a more vibrant and engaging work environment at the new location. Comerica leased new space at the Biltmore Center in the Camelback Corridor, and relocated operations in September 2015. This new space and work environment combines a variety of flexible workspaces with additional technology to bring our teams together and enhance our collaboration. Materials from our former workplace were recycled including light fixtures, ceiling tiles, carpet, and metal studs. In addition, we were able to donate the furniture from our former location to several local non-profit organizations including Fresh Start Women's Foundation, Hispanic Chamber of Commerce, Phoenix Pride and Salvation Army.

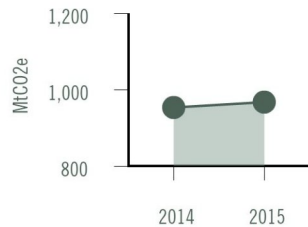
So far the results have been impressive. Compared to the previous location, we were able to reduce our occupied square footage by 24 percent and still have capacity to expand the number of colleagues working at this location. Since our corporate GHG emissions closely correspond to our real estate footprint, reducing our occupied space helped reduce our overall emissions. Collaboration metrics have also increased since the relocation, helping drive better colleague and customer relationships consistent with The Comerica Promise.



Travel Emissions (Scope 1) Progress

Scope 1 Travel Emissions Trend (2015 vs. 2014)

Scope 1 Travel Emissions



Comerica's Scope 1 travel (fleet, corporate jet) activities increased slightly by 14 MtCO₂e, or 1.5 percent, compared to 2014. Our fleet emissions decreased 1.1 percent due to less travel conducted in the company's fleet vehicles while our corporate jet emissions increased 2 percent due to higher usage of the corporate jet for business purposes.

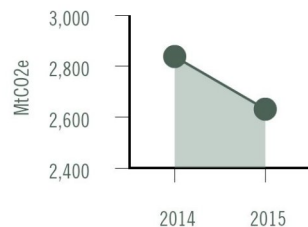
As a relationship-based company, travel is a critical part of our business. In recognition of the GHG footprint from our owned vehicles, Comerica elected to offset 100 percent of the emissions of our fleet and corporate jet for 2015, totaling 967 MtCO₂e. Our carbon credits to offset these emissions are for the Southex Greenwood Farms landfill gas capture project in Tyler, Texas, and certified by The Climate Action Reserve (CAR).

Value Chain Emissions (Scope 3) Progress

We provide emissions data for eight of the 15 Greenhouse Gas Protocol's *Corporate Value Chain (Scope 3) Accounting and Reporting Standard* categories for Scope 3 emissions. We were able to add one new Scope 3 emissions data point in 2015: the travel data associated with one of our key suppliers (CBRE) related to travel that they perform as part of managing Comerica's facilities. We have incorporated these Scope 3 emissions into the Other Downstream emissions category.

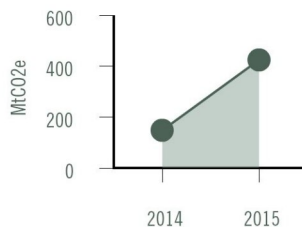
Scope 3 Emissions Trends (2015 vs. 2014)

Product and Service Emissions



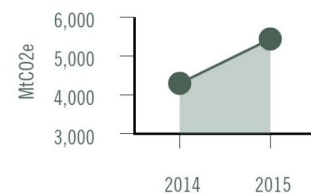
Overall, products and service emissions decreased, primarily due to a decrease in total paper purchases and computer purchases.

Furniture Emissions



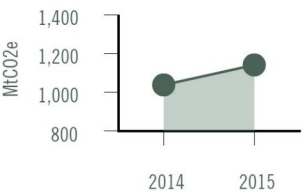
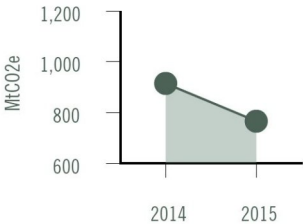
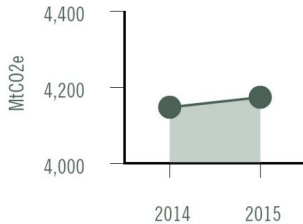
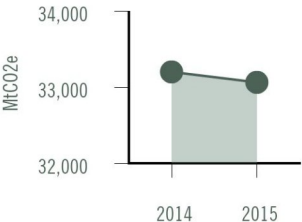
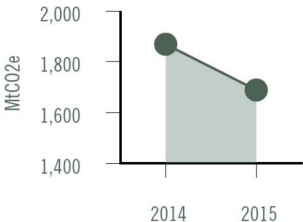
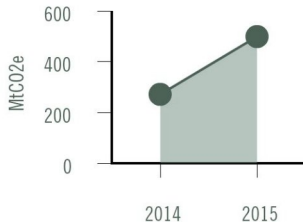
Furniture emissions increased due to an increase in purchases in 2015 and the addition of a furniture vendor not previously included in our estimates. However, when we make furniture purchases, we look for greener choices, with 92 percent of Comerica's 2015 furniture purchases carrying the BIFMA level® sustainable product certification.

Electricity Distribution Line Loss Emissions



Electricity distribution line loss emissions increased even while our electricity consumption decreased by 6.8 percent in 2015 (vs. 2014). This was primarily due to an increase in the grid gross loss emission factors in the most current eGRID version (eGRID 2012; released in 2015).

Scope 3 Emissions Trends (2015 vs. 2014)

<p>Upstream Transportation & Distribution Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Upstream Transportation & Distribution Emissions (MtCO₂e)</td> <td>~1,050</td> <td>~1,150</td> </tr> </tbody> </table>	Year	2014	2015	Upstream Transportation & Distribution Emissions (MtCO ₂ e)	~1,050	~1,150	<p>Landfilled Waste Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Landfilled Waste Emissions (MtCO₂e)</td> <td>~950</td> <td>~780</td> </tr> </tbody> </table>	Year	2014	2015	Landfilled Waste Emissions (MtCO ₂ e)	~950	~780	<p>Employee Business Travel Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Employee Business Travel Emissions (MtCO₂e)</td> <td>~4,150</td> <td>~4,180</td> </tr> </tbody> </table>	Year	2014	2015	Employee Business Travel Emissions (MtCO ₂ e)	~4,150	~4,180
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<p>Our upstream transportation and distribution emissions increased primarily due to an increase in our FedEx shipping.</p>	<p>Our landfilled waste emissions went down 16 percent compared to 2014 as a result of a reduction in the amount of waste that we sent to the landfill and a decrease in the waste to landfill emission factor used to calculate emissions in EPA's WARM model.</p>	<p>There was a slight increase (0.6 percent) in our employee business-related travel emissions. Our air and personal vehicle mileage was slightly up while our car rental miles decreased compared to 2014.</p>																		
<p>Employee Commuting Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Employee Commuting Emissions (MtCO₂e)</td> <td>~33,300</td> <td>~33,100</td> </tr> </tbody> </table>	Year	2014	2015	Employee Commuting Emissions (MtCO ₂ e)	~33,300	~33,100	<p>Downstream Leased Asset Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Downstream Leased Asset Emissions (MtCO₂e)</td> <td>~1,880</td> <td>~1,700</td> </tr> </tbody> </table>	Year	2014	2015	Downstream Leased Asset Emissions (MtCO ₂ e)	~1,880	~1,700	<p>Other Downstream Emissions</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>2014</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Other Downstream Emissions (MtCO₂e)</td> <td>~280</td> <td>~500</td> </tr> </tbody> </table>	Year	2014	2015	Other Downstream Emissions (MtCO ₂ e)	~280	~500
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Year	2014	2015																		
Other Downstream Emissions (MtCO ₂ e)	~280	~500																		
<p>Our employee commuting emissions were slightly lower (<1 percent) than 2014. We had a similar response rate to our employee commuting survey (26 percent) so we anticipate employee's commuting practices were relatively unchanged compared to last year.</p>	<p>Comerica's downstream leased assets were down 9.7 percent in 2015 due to lower subleased metered electricity, subleased natural gas, and subleased steam emissions. The decreases were largely due to energy conservation activities in the parent properties as well as space consolidation and lease expirations in the subleased portfolio (the portfolio decreased by 11,898 SF as compared to 2014).</p>	<p>While the subleased corporate jet emissions decreased 9.6 percent over 2014, our total "Other downstream emissions" increased because we added a new 2015 emissions source (CBRE travel on the Comerica account).</p>																		

For more detailed information on Comerica's 2015 GHG emissions data and progress, please refer to our [2016 CDP Response](#) or the [Key Statistics Table](#) in this report. Our greenhouse gas emissions management approach did not change significantly in 2015. For details on Comerica's emissions management approach, please refer to Pages 54-57 of the [2014 Comerica Sustainability Report](#).

Environmentally Beneficial Lending

Impact Topic Green Lending

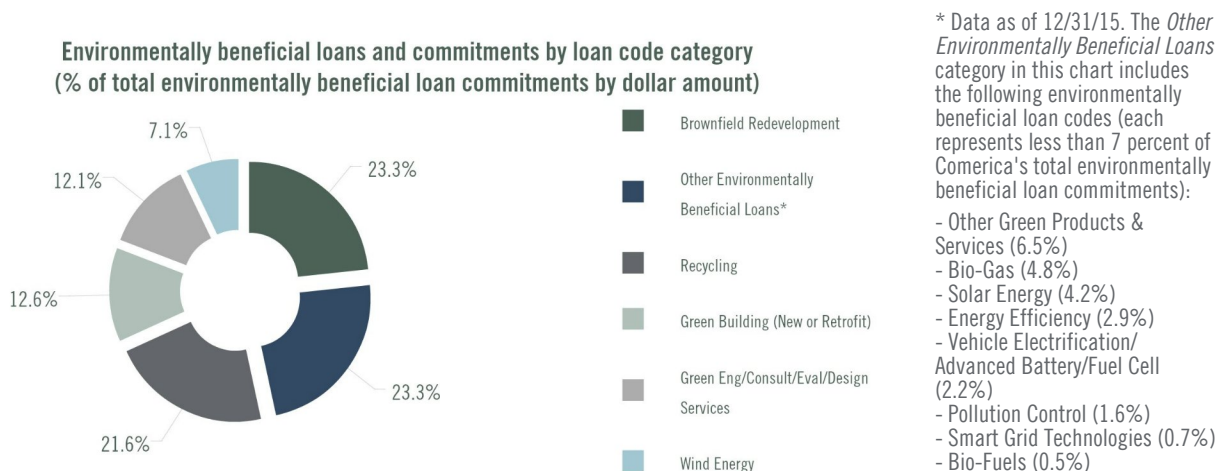
As providers of financial services, we recognize our sustainability influence extends beyond our own footprint. By working with companies involved in environmentally beneficial industries and projects, we are able to extend sustainability to our customers. We continue to track the loans and commitments that we make to environmentally beneficial or "green" companies and/or projects.

In 2015, our environmentally beneficial loans and commitments totaled approximately \$919 million to 116 customers, compared to \$975 million to 105 customers in 2014. Although we saw a 5.7 percent reduction in green coded loans and commitments, we increased the number of customers to which we provided green loans or commitments by 10.5 percent. To assure the proper identification and tracking of green loans, we continue to educate our credit and lending colleagues on how to properly code green loans and commitments in our systems.

We currently track the following 14 green loan codes in our loan tracking system:

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

For a breakdown of Comerica's green loans and commitments percentage by environmentally-beneficial category, please refer to the following chart.



Sustainability Highlight: Helping Customers to Realize Their Sustainability Successes

Since 2009, Comerica has worked to meet the financial needs of Enerdyne Power Systems, Inc. (Enerdyne), a landfill gas system developer, co-developer, owner and operator. Established in 1991, Enerdyne provides a complete approach to all aspects of the landfill gas industry, including a complete construction division (Advance One) and manufacturing/fabrication division (Advanced BioGas Systems). By utilizing their ownership perspective and comprehensive in-house solutions, Enerdyne has been involved in over 50 landfill gas to energy projects to date.

Landfill gas is produced from waste as it degrades in landfills. Methane, one of the more potent GHGs, is a primary component of landfill gas. Without systems in place to capture the landfill gas, these GHGs can be directly emitted to the atmosphere. But by capturing landfill gas, Enerdyne's projects both avoid emissions from fugitive GHGs and moreover use the resulting gas to produce energy.

William P. Brinker, Managing Director of Enerdyne, indicates that Comerica's financing has fueled project development and provided the resources needed for their related entities to grow. Enerdyne's projects play a significant role in reducing GHG emissions, with 1.4 million metric tons of CO₂e reduced in 2015. That's equivalent to the emissions sequestered by over 1 million acres of U.S. forestland or avoiding the emissions from burning over 160 million gallons of gasoline.



“By understanding our industry and business, Comerica is an excellent partner for the financing of landfill gas to energy projects. With great people and great service, they’re more than just a bank.” -William P Brinker, Enerdyne Power Systems



Our management approach to green lending has not changed over the last year. For details on the management approach, please refer to Pages 61-62 of the [2014 Comerica Sustainability Report](#).

SUSTAINABILITY ENGAGEMENT

Engaging Colleagues on Sustainability

Sustainability is an integral part of our core value of Involvement. Viewed broadly, sustainability is all about being involved — whether it's at the local community level, or on a global scale, we understand how our success is intertwined with others. As such, we recognize that our colleagues' understanding of and enthusiasm for environmental sustainability is important to Comerica's continued sustainability progress.

In 2015, we added some new sustainability engagement activities, as well as continuing our existing methods.

Tools for Communicating Sustainability and Involving Colleagues

NEW: A voluntary Master of Sustainability Awareness Program, available in 2015 to all Service Company colleagues (e.g., operations, IT, Information Services, and other service-related bank colleagues)	NEW: Targeted presentations to individual business units and leadership groups on specific sustainability topics
NEW: Implementation of a Corporate Responsibility Collaboration Working Group with members from Comerica's Business Affairs, Public Affairs, and Corporate Sustainability departments	NEW: Development of a new employee Sustainability blog by Scott Beckerman, Comerica's Director of Corporate Sustainability
Frequent communications on our company intranet and sustainability intranet sites	Narrated sustainability presentations on our sustainability intranet site
Eleven local green office teams	Mandatory new employee sustainability awareness training. In 2015, 99.8 percent of employees new to Comerica (1,208 employees) completed the course
Real Estate Sustainability Working Group	Green Procurement Work Group

Master of Sustainability Awareness (MSA) Program

Starting as a recommendation from Comerica's Service Company Sustainability Committee, Comerica's Corporate Sustainability Office, in conjunction with committee members, developed an internal sustainability certification program called the Master of Sustainability Awareness (MSA) Program, which uses the company's corporate learning platform.



Comerica's MSA internal certification program is built on a foundation of four dimensions: Education, Communication, Engagement, and Advocacy. With MSA, we use the metaphor of a growing tree. Our colleagues start at the Seedling level, where the focus is on education, then progress to the Sapling level, where there is balance over the four dimensions, and finish at the Mighty Oak level, where the focus is on advocacy — the 'doing' part of sustainability. The MSA process is designed to move Comerica colleagues from learning about sustainability, to sharing what they have learned, and finally putting it into action by doing things that support Comerica as a more sustainable organization and bring sustainability to colleagues' personal lives.

The MSA pilot program ran from July to September 2015 and the program launched to all Service Company colleagues in December 2015. By year-end 2015, we had 79 Comerica colleagues enrolled in the MSA Program with our first 4 MSA Seedling level-certified colleagues.

Comerica's Green Office Teams

In 2015, there were eleven active Comerica green office teams made up of voluntary colleague environmental sustainability champions who are based at our larger office buildings. The teams have organized year-round sustainability awareness and community involvement initiatives since 2009, with major initiatives centered around Earth Day in April and Comerica's National Day of Service in September.

In 2015, our teams coordinated and participated in 47 internal and community-based sustainability events and activities, including environmental volunteering projects, employee contests, children's art contests, child clothing exchanges, and lunch and learn educational events. Following are two examples of our 2015 green office team activities:

Sustainability Highlight: Sustainability Champions at Work

In April 2015, two of our California green office team locations (Costa Mesa and San Jose) held lunch and learn events to educate colleagues on the benefits of home solar systems. SunPower representatives discussed the advantages and the different types of solar systems during the events. As the events were well received by our colleagues, our green office team in Costa Mesa worked with our Corporate Sustainability Office and Human Resources department to implement a corporate-wide SunPower employee solar rebate program in late 2015.



In September 2015, our Comerica Bank Center (CBC) green office team in downtown Detroit went to Lafayette Greens, an urban garden in the heart of downtown Detroit, to help harvest vegetables and herbs during Comerica's National Day of Service.

Pictured to left are: Lisa Sasaki, CBC's green office team leader, and Scott Beckerman, Comerica's Director of Corporate Sustainability.

Engaging With Suppliers

Supply Chain Sustainability

Recognizing that our own environmental impacts are influenced by the goods and services we procure, Comerica engages with our supply chain to manage risk, reduce cost, and ensure performance requirements. Our supply chain partners support sustainability by demonstrating both their own commitments to being more sustainable organizations as well as providing goods and services in ways that support Comerica's sustainability commitments.

We scored the first round of supplier sustainability questionnaires between 2011-2014 for suppliers represented in the top 30 percent of spend from previous years. We started the second round of scoring in 2014, which is expected to be completed in 2017.

34	37%
Number of active suppliers screened for environmental sustainability progress from 2011-2015	Percentage of spend that was screened for environmental sustainability in 2015

Every three years, suppliers are scored (A through F) on their sustainability practices and when suppliers fall short of the target sustainability rating, the Corporate Procurement sustainability lead and the Corporate Sustainability team conducted performance reviews with the suppliers and suggest potential improvements. There were 27 suppliers that have been scored in both rounds as of year-end 2015. Of those suppliers, 12 scored below the target range in the second round of scoring, a decrease from the 14 companies that were listed below the target range after the first round of scoring. We have asked these companies for sustainability updates through their business reviews to keep apprised of their sustainability progress.

Success over time can be measured by the percentage of total spend that is placed with suppliers at performance bands A, B, and C. We have set a goal to increase the percentage we spend with suppliers in the target range by 5 percent each 3-year survey cycle. As of 2015, our spend with suppliers who scored within the questionnaire's acceptable range (comparing Round 1 to Round 2) increased by 1 percent over the last 3 years, while the spend dollars with suppliers within the target range increased by 14 percent compared to Round 1 (2012).

7%	\$92 Million
Increase in average score of the supplier scoring waves (Round 2 vs. Round 1)	Spend with suppliers that scored in Comerica's sustainability survey target range, approximately 15 percent of our accounts payable spend

Screening New Suppliers

We screen suppliers considered for new business using environmental criteria included in the standard language for our Requests for Proposals (RFPs). These criteria address GHG emissions, energy, water, and paper consumption and reduction programs, non-recycled waste, and environmentally preferable procurement practices. Companies sustainability responses are a factor in our supplier selection.

In 2015, Comerica had a total of 86 projects that went through a Request for Proposal (RFP) process, with 36 of the RFPs (42 percent) including sustainability questions that were scored. Those 36 RFPs represented 72 percent of the spend value of all 2015 projects. The remaining projects not scored for the sustainability were related to real estate products and services, some of which are very small or narrow in scope. However, our Corporate Real Estate department incorporates

sustainability into their bid request process by scoping out efficient and sustainable products, where feasible, and also requests current supplier sustainability information on their suppliers be provided during their supplier business reviews.

Sustainability Highlight: Green Supply Chain Recognition

In 2015, Comerica received its second consecutive annual Green Supply Chain Award from *Supply & Demand Chain Executive* (S&DC) Magazine for the company's efforts to engage with its supply chain on sustainability.



"Comerica appreciates S&DC's recognition of our efforts to green our supply chain. It marks a great partnership between our colleagues in procurement and sustainability, along with the support of our key suppliers. We realize that our impacts extend beyond our own footprint, and managing supply chain sustainability is a part of our commitment to raising the expectations of our stakeholders." - Teresa Lefevre, Comerica's Green Procurement Work Group Leader and Supplier Diversity Manager

Overall, our approach to the environmental screening of our suppliers did not significantly change in 2015. For details on our supplier scoring approach, please refer to Pages 70-71 of the [2014 Comerica Sustainability Report](#) or Section 14 of our [2016 CDP Response](#).

Environmentally Responsible Procurement

Our Green Procurement Work Group continues to oversee our Environmentally Preferred Procurement (EPP) program. We track the sustainable attributes of the following product categories: carpeting, computers, furniture, [paper](#) (discussed previously), office cleaning, and office supplies. When making purchases in these product categories, we consider the following sustainable attributes:

- The recycled content of the carpet products,
- The quantity of computer purchases that meet the IEEE Electronic Product Environmental Assessment Tool (EPEAT) ratings, which consider the entire lifecycle of the computer,
- The quantity of furniture purchases that receive the Business and Institutional Furniture Sustainability Standard (BIFMA) level® certification, which considers materials used, energy and climate impact, human and ecosystem impacts, and social responsibility,
- Sustainable forestry certifications (like FSC) and post-consumer recycled content (PCR),
- Types of chemicals used in daily janitorial cleaning of Comerica managed facilities, and
- Office supply purchases that are rated "green" on Office Depot's GreenerOffice™ sustainability scale.

<i>EPP Performance</i>				
Carpeting	Computers	Furniture	Office Supplies	Office Cleaning
98%	100%	92%	41%	100%
of carpet purchases contained recycled content in 2015	of computers purchased carried the EPEAT Gold Rating in 2015	of furniture purchases were level® certified in 2015 (compared to 87 percent in 2014)	of office supplies purchases were rated as "green" by Office Depot in 2015 (compared to 57 percent in 2014)	of daily janitorial cleaning was performed using green cleaning products in 2015 (Comerica managed facilities)

In 2015, we saw a 4 percent increase in our furniture purchases that were level® certified. However, our green-rated office supply purchases decreased by 28 percent. This was related to a reduction in our overall office copy paper purchases (the majority of which included 30 percent post-consumer recycled content) while we increased communications technology purchases that were not green rated.

Sustainability Highlight: Sharing Surplus Office Supplies Among Offices

After several of our green office teams at larger buildings expressed a need, Comerica's Sustainability Office developed an online Office Supply Exchange to help colleagues move surplus office items around the company. This exchange has engaged employees who have responsibilities for purchasing office supplies by helping them to share surplus and unused office supplies instead of throwing those items in the trash. At year end 2015, our colleagues had exchanged more than 10,000 office supply items, including paper and binder clips, folders, binders, and specialty forms & papers. Many of the office supply items were lower-cost office supplies, but we did see a cost avoidance of over \$6,000 from not having to purchase those items new.

Post and Place Your Orders Here



Click on image to left to **POST** an item to the Office Supply Exchange



Click on image to left to **ORDER** an item from the Office Supply Exchange

Above: Excerpt from the online Office Supply Exchange on Comerica's intranet site.

Overall, our approach to environmentally preferential purchasing did not change significantly compared to 2014. For details on our Environmentally Preferred Procurement (EPP) approach, please refer to Pages 60-61 of the [2014 Comerica Sustainability Report](#).

2016 SUSTAINABILITY PRIORITIES

2015 presented a challenging environment for financial institutions, with persistently low interest rates combined with a host of increasing regulatory and technology demands. Moving forward, we embrace such challenges and look to our value creation approach to sustainability as a critical element in the execution of our business plans.



"We are driven by doing what is right for our clients, employees, shareholders and the communities we serve. That is the Comerica way. It is how we raise expectations of what a bank can be."

- Ralph W. Babb Jr., Chairman and Chief Executive Officer

Developed by Comerica's Sustainability Council and officially adopted by the Enterprise Risk Committee of the Board of Directors, our 2016 Sustainability Action Plan is comprised of 36 interlinking projects and initiatives that are intended to advance our progress as we build additional sustainable value. We have worked hard to establish the systems and processes to manage our own footprint and look to make additional gains in supporting our customers and communities through our relationship banking approach. As such we are 'staying the course' on our approach to expanding sustainable value creation through advancing knowledge & innovation, opportunities & revenues, cost & risk reduction, and reputation & brand.

2016 Sustainability Priorities

<i>Sustainability as a driver of business value through:</i>	<i>Planned activities to support priorities:</i>
Ongoing stakeholder engagement & verification of impact issues	To continue our impact assessment work unveiled last year, our stakeholder engagement (planned for fall 2016) will focus on verifying our existing impact topics, gaining a deeper understanding of stakeholder perspectives.
Continued management and reduction of our own environmental footprint in line with our 2020 goals	We will work to drive additional improvements in our emissions, water, waste, and paper reductions through specific projects such as smart irrigation controls, building management systems, and further evaluation of our alternate workplace strategy.
Focusing on products, services and relationships	Working with our business leaders and Sustainability Council Members, we will seek to identify new ways to support our customers through knowledge sharing and innovative offerings designed to support a greening economy.
Deepening colleague engagement on sustainability	Drive further sustainability knowledge through the expansion of Master of Sustainability Awareness (MSA) Program offerings and enrollment activities, and share thought-provoking information through the "Making Sustainability a Priority" Sustainability Director's Blog.
Monitoring ongoing and emerging sustainability risks and opportunities	By leveraging our stakeholder relationships and evaluating local, regional, and global sustainability trends, we will improve our ability to understand and manage both the risks and opportunities associated with corporate sustainability.

ADDITIONAL INFORMATION

Key Statistics Table

KEY STATISTICS	2012	2013	2014	2015
ECONOMIC IMPACTS				
Gross revenue (Millions \$)	2,733	2,666	2,618	2,834
Market capitalization at year end (Millions \$) ¹	5,712	8,667	8,385	7,350
Common and preferred stock dividends (Millions \$)	106	126	143	148
Taxes (Millions \$)	98	283	165	318
Employee compensation and benefits (Millions \$)	1,018	1,009	980	1,009
Goods and services purchased (Millions \$)	724	695	628	815
Total loans at year end (Millions \$)	46,057	45,470	48,593	49,084
SOCIAL IMPACTS				
Market Presence				
Number of ATMs	640	635	639	637
Number of U.S. banking centers	488	482	480	476
Community Development				
Community and economic development loans (Millions \$)	174	512	354	342
Low-income housing tax credit investment deals closed (Millions \$)	69	74	74	78
Historic rehabilitation tax credit investment (Millions \$)	1.2	6.5	0	1.9
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (%)	N/A	N/A	10	7
Number of investments in micro-enterprise loan funds	29	25	29	27
Supplier diversity spend (Millions \$)	70	70	67	110
ENVIRONMENTALLY BENEFICIAL LENDING				
Environmentally-Beneficial Loans				
Loan commitments (Millions \$)	1,043	780	975	919
Loan commitments (number of companies)	127	101	105	116
ENVIRONMENT-OPERATIONS				
Energy Use (MWh)				
Total direct & indirect energy use- real estate and transport	153,210	149,742	146,939	143,394
Total direct & indirect energy use- real estate only	148,266	144,783	143,015	139,405
Direct energy use- fossil fuels	30,966	38,939	42,891	33,672

KEY STATISTICS	2012	2013	2014	2015
Energy Use (MWh)- Continued				
Indirect energy use- purchased electricity, steam, chilled water in metered buildings	93,779	85,505	80,163	77,514
Indirect energy use- estimated electricity use in leased (and unmetered) buildings	28,465	25,298	23,885	28,219
Energy Intensity				
Total direct and indirect energy use- real estate (MWh) per square foot at year end	0.0267	0.0267	0.0267	0.0269
Total direct and indirect energy use- real estate (MWh) per square foot - average square feet over four quarters	N/A	0.0265	0.0265	0.0263
Total direct and indirect energy use- real estate and transport (MWh) per full time employee (FTE)	16.96	16.73	16.55	16.15
Scopes 1 & 2 GHG Emissions (Metric tons of CO ₂ e)- Real Estate and Transport ²				
Total GHG Emissions from Real Estate (Scopes 1&2) and Travel (Scope 1)	81,735	75,839	73,200	68,603
Breakdown by Activity				
GHG emissions- Scopes 1 & 2 real estate only	80,533	74,635	72,247	67,636
Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end)	0.0145	0.0138	0.0135	0.0131
Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters)	N/A	0.0137	0.0134	0.0128
% Cumulative reduction from 2012 base year (Goal= 20% GHG reduction from base year by 2020)	N/A	7.2	10.3	16.0
GHG emissions- Scope 1 transport only	1,201	1,204	953	967
Breakdown by Scope				
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	8,019	8,523	7,638
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings and estimated natural gas & estimated propane (heat)	74,784	67,820	64,677	60,965
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport ²				
Purchased Goods & Services				
Total lifecycle paper emissions	3,055	2,873	2,511	2,152
Life cycle emissions associated with office copy paper use	1,270	1,136	1,030	933
Life cycle emissions associated with other office paper use	1,563	1,558	1,262	1,050
Life cycle emissions associated with marketing paper use	222	178	219	170
Total lifecycle computer emissions	520	57	202	193
Total lifecycle carpeting emissions	137	168	125	287
Capital Goods				
Total lifecycle furniture emissions ³	N/A	463	148	425

KEY STATISTICS	2012	2013	2014	2015
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport ² - Continued				
Fuel-and-energy related activities				
Electricity transmission/distribution loss emissions	N/A	4,442	4,302	5,441
Upstream Transportation and Distribution				
Shipping emissions	N/A	572	404	501
Armored vehicle emissions	N/A	967	635	640
Waste Generated in Operations				
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	2,033	914	765
Business Travel				
Employee business travel by air and car	4,431	4,791	4,147	4,174
Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE)	0.49	0.54	0.47	0.47
Employee Commuting				
Employee commuting emissions	N/A	35,864	33,200	33,061
Downstream Leased Assets				
<i>Total subleased real estate emissions</i>	1,257	1,508	1,869	1,688
Subleased metered electricity	726	665	629	484
Subleased estimated electricity	423	715	1,107	1,120
Subleased natural gas	81	106	108	76
Subleased steam	28	22	25	8
Other Downstream				
Subleased corporate jet emissions	N/A	N/A	272	246
Real Estate Square Footage (Square feet at year end)				
Total metered and unmetered square feet	5,545,466	5,422,833	5,349,936	5,183,634
Total subleased square feet at year end	137,637	197,753	188,292	173,886
Real Estate Square Footage (Average square feet over four quarters)				
Average metered and unmetered square feet over four quarters	N/A	5,464,632	5,398,441	5,291,828
Average subleased square feet over four quarters	N/A	159,866	193,282	181,384
Waste Management (short tons)				
Landfilled employee waste	2,086	2,067	1,732	1,583
Total recycled/re-purposed waste	3,372	2,990	2,915	2,917
Recycled office paper	3,108	2,680	2,684	2,676
Recycled electronic equipment	94	117	52	51
Repurposed electronic equipment	55	46	15	26
Recycled employee waste	110	141	154	153

KEY STATISTICS	2012	2013	2014	2015
Waste Management (short tons)- Continued				
Recycled cardboard bailer waste	N/A	N/A	7	7
Universal waste	3	5	3	4
Total waste diverted from landfill (%) including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste	62	59	63	65
Water Use (cubic meters) ⁴				
Total water consumption (cubic meters)	451,532	412,123	349,785	339,438
Intensity metric- Water consumption (cubic meters per FTE)	49.98	46.06	39.41	38.22
Intensity metric- Water consumption (cubic meters per Total Occupant FTE)	N/A	43.83	37.03	35.04
Paper Use				
Total paper consumption (tons)	1,266	1,173	1,039	894
Office copy paper consumption (tons)	560	487	454	410
Other office paper consumption (tons)	618	615	499	416
Marketing paper consumption (tons)	88	71	87	68
Intensity metric- Total office paper (office copy and other office paper) consumption in pounds per FTE	260.76	246.31	214.73	186.07
Intensity metric- Office copy paper consumption in pounds per FTE (tons)	123.96	108.88	102.30	92.41
<i>Environmental Attributes of Paper</i>				
Total FSC-certified office paper (% of total)	47.48	27.88	47.82	49.44
Total FSC-certified marketing paper (% of total)	64	90	80	99
Office copy paper with at least 30% post-consumer recycled content (%)	97	74	96	95
All other papers (excluding office copy paper) with at least 10% post-consumer recycled content (%)	14	12	14	25
Total post-consumer recycled content by weight (% of total paper consumption)	14	13	10	15
EMPLOYEES				
Number of Comerica Employees				
Total Employees- Full-time equivalents (FTEs)	9,035	8,948	8,876	8,880
Total Occupants for combined portfolio (including employees and contractors, on FTE basis)	N/A	9,403	9,447	9,687
Employee Diversity				
Women employees (%)	68	68	67	67
Women Officers and Managers (total number) ⁵	N/A	1,199	1,219	1,252
Women Professionals (total number) ⁵	N/A	1,370	1,437	1,498
Women Administrative Support (total number) ⁵	N/A	3,462	3,365	3,274

KEY STATISTICS	2012	2013	2014	2015
Employee Diversity- Continued				
Diverse population employees (%)	38	38	38	39
Diverse Officers and Managers (total number) ⁵	N/A	618	638	661
Diverse Professionals (total number) ⁵	N/A	726	789	835
Diverse Administrative Support (total number) ⁵	N/A	2,051	1,993	1,967
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program (%)	N/A	N/A	85	80
Bronze-level certified colleagues (number of colleagues) ⁶	N/A	N/A	5,028	5,345
Silver-level certified colleagues (number of colleagues) ⁶	N/A	N/A	3,536	4,081
Gold-level certified colleagues (number of colleagues) ⁶	N/A	N/A	2,373	3,031
Platinum-level certified colleagues (number of colleagues) ⁶	N/A	N/A	1,237	1,555
Employee Benefits				
Services provided through Comerica's Employee Assistance Program (# of instances) ⁷	N/A	4,570	4,499	3,854
Employees receiving tuition assistance (total number)	132	248	226	212
Value of tuition assistance received (\$)	852,680	886,599	801,200	814,508
Leadership Development Program (number of graduates)	47	49	44	29
CoStar Awards (number of monetary awards to employees)	2,657	2,746	2,571	2,270
Value of CoStar Awards (\$)	378,000	392,000	391,000	387,000
COMMUNITY				
Charitable gifts and corporate contributions (Millions \$)	9.1	8.4	8.8	8.8
Employee United Way contributions (Millions \$)	2.0	2.2	2.1	2.2
Employee time volunteered (hours)	71,000	72,186	73,970	73,800
Number of employee volunteers	2,300	2,514	2,543	2,853

¹ Source: SNL Financial

² Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for calculating its GHG emissions. Specific methodologies for estimating all Scope 1, Scope 2, and Scope 3 emissions shown in the table, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in [Comerica's 2016 CDP Response](#).

³ Approximately 64% of the furniture products that we purchased in 2015 are covered in this estimate. 2015 was the first year that we estimated a portion of Knoll furniture emissions. Knoll currently has a lifecycle assessment for one of the products that we purchased in 2015. We used the emission factor provided for this product along with the Herman Miller furniture emission factors to calculate our total emissions.

⁴ 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.

⁵ In 2015, EE01 categories replaced existing category assignments based on employee job codes and grades, which were previously reported. These calculations were revised back to 2013 using EE01 categories. Restated numbers are italicized.

⁶ MDA level listings are cumulative. If a colleague has been certified at the Platinum level, he/she is also counted in the bronze, silver and gold certification level. If at the Gold certification level, he/she is also counted in the silver and bronze level. If at the Silver certification level, he/she is also counted in the bronze level.

⁷ The data being collected by Comerica's Employee Assistance Program (EAP) provider is better represented by the title "Services Provided through Comerica's Employee Assistance Program (# of instances)" instead of the previously reported "Number of employees assisted through Comerica's EAP". We are able to report on this metric back to 2013 when our current EAP provider began collecting this data. Restated numbers are italicized.



Comerica Bank:
MEMBER FDIC. EQUAL OPPORTUNITY
LENDER.

Comerica:
EQUAL OPPORTUNITY EMPLOYER.
Comerica Conducts Pre-Employment Drug Testing

Updated 2014-2015 GRI G4 Content Index- Core

Please note: In our 2015 Comerica Sustainability Progress 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 Guidelines define as “Material Aspects.” 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 GRI G4 Content 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 guidelines.

Our 2015 Comerica Sustainability Progress Report is not intended to meet all “Core” requirements of GRI G4. This Content Index primarily serves as a limited update of the company’s 2014 response to GRI G4 standard disclosures and environmental indicators. This Index includes updated information, where available, or refers to the 2014 GRI G4-based report for information. In some instances, we have also included non-core GRI General Standard 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 Aspects within the Specific Standard Disclosures, which we have determined to be “non-material” since that information may be of interest to our stakeholders.

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the ‘in accordance’ options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
GENERAL STANDARD DISCLOSURES- CORE					
STRATEGY AND ANALYSIS					
G4-1	—	<p>a. Provide a statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and the organization’s strategy for addressing sustainability.</p> <p>The statement should present the overall vision and strategy for the short term, medium term, and long term, particularly with regard to managing the significant economic, environmental and social impacts that the organization causes and contributes to, or the impacts that can be linked to its activities as a result of relationships with others (such as suppliers, people or organizations in local communities). The statement should include:</p> <ul style="list-style-type: none">• Strategic priorities and key topics for the short and medium term with regard to sustainability, including respect for internationally recognized standards and how such standards relate to long term organizational strategy and success• Broader trends (such as macroeconomic or political) affecting the organization and influencing sustainability priorities• Key events, achievements, and failures during the reporting period• Views on performance with respect to targets• Outlook on the organization’s main challenges and targets for the next year and goals for the coming 3–5 years• Other items pertaining to the organization’s strategic approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Letter from our Chairman and CEO)
ORGANIZATIONAL PROFILE					
G4-3	—	a. Report the name of the organization.	Yes	Full response for Core	Company Profile
G4-4	—	a. Report the primary brands, products, and services.	Yes	Full response for Core	Company Profile
G4-5	—	a. Report the location of the organization’s headquarters.	Yes	Full response for Core	This GRI Index- Comerica Corporate Headquarters Comerica Bank Tower 1717 Main Street Dallas, Texas 75201
G4-6	—	a. Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	Yes	Full response for Core	Company Profile

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G4-7	—	a. Report the nature of ownership and legal form.	Yes	Full response for Core	Company Profile
G4-8	—	a. Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).	Yes	Full response for Core	Company Profile
G4-9	—	a. Report the scale of the organization, including: <ul style="list-style-type: none"> • Total number of employees • Total number of operations • Net sales (for private sector organizations) or net revenues (for public sector organizations) • Total capitalization broken down in terms of debt and equity (for private sector organizations) • Quantity of products or services provided 	Yes	Full response for Core	Company Profile Key Statistics Table 2015 Annual Report
G4-10	—	a. Report the total number of employees by employment contract and gender. b. Report the total number of permanent employees by employment type and gender. c. Report the total workforce by employees and supervised workers and by gender. d. Report the total workforce by region and gender. e. Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors. f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries).	Yes	2014 Sustainability Report provides full response for Core; Identified omission and reason for omission provided in 2014 Sustainability Report GRI Index	2014 Comerica Sustainability Report (Sections: Employees, Diversity Inclusion, Key Statistics Table, 2014 GRI G4 Index)
G4-11	—	a. Report the percentage of total employees covered by collective bargaining agreements.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
G4-12	—	a. Describe the organization's supply chain.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Supply Chain Management)
G4-13	—	a. Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain, including: <ul style="list-style-type: none"> • Changes in the location of, or changes in, operations, including facility openings, closings, and expansions • Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations) • Changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination 	Yes	2015 Annual Report provides update; 2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Company Profile) 2015 Annual Report

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G4-14	—	a. Report whether and how the precautionary approach or principle is addressed by the organization.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Risk Management)
G4-15	—	a. List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
G4-16	—	a. List memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization: <ul style="list-style-type: none">• Holds a position on the governance body• Participates in projects or committees• Provides substantive funding beyond routine membership dues• Views membership as strategic <p>This refers primarily to memberships maintained at the organizational level.</p>	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Risk Management, Public Policy, Community Reinvestment and Development, Supplier Diversity Program)
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES					
G4-17	—	a. List all entities included in the organization's consolidated financial statements or equivalent documents. b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report. The organization can report on this Standard Disclosure by referencing the information in publicly available consolidated financial statements or equivalent documents.	Yes	2015 Annual Report provides update; 2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: About this Report, Company Profile) 2015 Annual Report
G4-18	—	a. Explain the process for defining the report content and the Aspect Boundaries. b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
G4-19	—	a. List all the material Aspects identified in the process for defining report content.	Yes	Relevancy Assessment provides update; 2014 Sustainability Report provides full response for Core	Relevancy Assessment 2014 Comerica Sustainability Report (Section: Stakeholder Engagement)

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G4-20	—	a. For each material Aspect, report the Aspect Boundary within the organization, as follows: <ul style="list-style-type: none">• Report whether the Aspect is material within the organization• If the Aspect is not material for all entities within the organization (as described in G4-17), select one of the following two approaches and report either:<ul style="list-style-type: none">– The list of entities or groups of entities included in G4-17 for which the Aspect is not material or– The list of entities or groups of entities included in G4-17 for which the Aspects is material• Report any specific limitation regarding the Aspect Boundary within the organization	Yes	Relevancy Assessment provides update; 2014 Sustainability Report provides full response for Core	Relevancy Assessment 2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
G4-21	—	a. For each material Aspect, report the Aspect Boundary outside the organization, as follows: <ul style="list-style-type: none">• Report whether the Aspect is material outside of the organization• If the Aspect is material outside of the organization, identify the entities, groups of entities or elements for which the Aspect is material. In addition, describe the geographical location where the Aspect is material for the entities identified• Report any specific limitation regarding the Aspect Boundary outside the organization	Yes	Relevancy Assessment provides update; 2014 Sustainability Report provides full response for Core	Relevancy Assessment 2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
G4-22	—	a. Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.	Yes	Key Statistics Table provides update; 2014 Sustainability Report provides full response for Core	Key Statistics Table 2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
G4-23	—	a. Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.	Yes	About this Report section provides update; 2014 Sustainability Report provides full response for Core	About this Report 2014 Comerica Sustainability Report (Section: About this Report)
STAKEHOLDER ENGAGEMENT					
G4-24	—	a. Provide a list of stakeholder groups engaged by the organization.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Stakeholder Engagement)

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G4-25	—	a. Report the basis for identification and selection of stakeholders with whom to engage.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
G4-26	—	a. Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Approach to Sustainability, Stakeholder Engagement)
G4-27	—	a. Report key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
REPORT PROFILE					
G4-28	—	a. Reporting period (such as fiscal or calendar year) for information provided.	Yes	About this Report section provides update; 2014 Sustainability Report provides full response for Core	About this Report 2014 Comerica Sustainability Report (Section: About this Report)
G4-29	—	a. Date of most recent previous report (if any).	Yes	About this Report section provides update; 2014 Sustainability Report provides full response for Core	About this Report 2014 Comerica Sustainability Report (Section: About this Report)
G4-30	—	a. Reporting cycle (such as annual, biennial).	Yes	About this Report section provides update; 2014 Sustainability Report provides full response for Core	About this Report 2014 Comerica Sustainability Report (Section: About this Report)

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G4-31	—	a. Provide the contact point for questions regarding the report or its contents.	Yes	About this Report section provides update; 2014 Sustainability Report provides full response for Core	About this Report 2014 Comerica Sustainability Report (Section: About this Report)
G4-32	—	a. Report the 'in accordance' option the organization has chosen. b. Report the GRI Content Index for the chosen option. c. Report the reference to the External Assurance Report, if the report has been externally assured. GRI recommends the use of external assurance but it is not a requirement to be 'in accordance' with the Guidelines.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: About this Report, GRI G4 Content Index)
G4-33	—	a. Report the organization's policy and current practice with regard to seeking external assurance for the report. b. If not included in the assurance report accompanying the sustainability report, report the scope and basis of any external assurance provided. c. Report the relationship between the organization and the assurance providers. d. Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index) 2015 Energy, emissions and waste data was externally assured- 2016 CDP Response
GOVERNANCE					
G4-34	—	a. Report the governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental and social impacts.	Yes	Corporate governance Guidelines provides update; 2014 Sustainability Report provides full response for Core	Corporate Governance Guidelines 2014 Comerica Sustainability Report (Section: Corporate Governance)

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ETHICS AND INTEGRITY					
G4-56	—	a. Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.	Yes	Corporate Governance Guidelines and Corporate codes provide updates; 2014 Sustainability Report provides full response for Core	Guidelines to Ethical Business Conduct Code of Business Conduct and Ethics for Employees Senior Financial Officer Code of Ethics Code of Business Conduct and Ethics for Members of the Board of Directors Recoupment Policy 2014 Comerica Sustainability Report (Section: Business Ethics)
GENERAL STANDARD DISCLOSURES - COMPREHENSIVE: PLEASE NOTE: This Content Index primarily serves as a limited update of the company's 2014 response to GRI G4 standard disclosures and environmental indicators; we have not attempted to prepare this GRI Report Content Index in accordance with GRI G4 Comprehensive requirements. However, where we feel that we have met all or a portion of the requirements of the disclosure (within this report or other externally published documents) we have identified it below. We have not responded to the following comprehensive standard disclosures: G4-36, G4-44, G4-46, G4-48, G4-50, G4-54, and G4-55. These disclosures are not required to meet GRI G4 Core, which was the goal of our 2014 report.					
G4-2	—	<p>a. Provide a description of key impacts, risks, and opportunities. The organization should provide two concise narrative sections on key impacts, risks, and opportunities.</p> <p>Section One should focus on the organization's key impacts on sustainability and effects on stakeholders, including rights as defined by national laws and relevant internationally recognized standards. This should take into account the range of reasonable expectations and interests of the organization's stakeholders. This section should include:</p> <ul style="list-style-type: none"> • A description of the significant economic, environmental and social impacts of the organization, and associated challenges and opportunities. This includes the effect on stakeholders' rights as defined by national laws and the expectations in internationally recognized standards and norms • An explanation of the approach to prioritizing these challenges and opportunities • Key conclusions about progress in addressing these topics and related performance in the reporting period. This includes an assessment of reasons for underperformance or over-performance • A description of the main processes in place to address performance and relevant changes <p>Section Two should focus on the impact of sustainability trends, risks, and opportunities on the long-term prospects and financial performance of the organization. This should concentrate specifically on information relevant to financial stakeholders or that could become so in the future. Section Two should include the following:</p> <ul style="list-style-type: none"> • A description of the most important risks and opportunities for the organization arising from sustainability trends • Prioritization of key sustainability topics as risks and opportunities according to their relevance for long-term organizational strategy, competitive position, qualitative, and (if possible) quantitative financial value drivers • Table(s) summarizing: <ul style="list-style-type: none"> – Targets, performance against targets, and lessons learned for the current reporting period – Targets for the next reporting period and medium term objectives and goals (that is, 3–5 years) related to key risks and opportunities • Concise description of governance mechanisms in place specifically to manage these risks and opportunities, and identification of other related risks and opportunities 	—	Partial response provided in 2016 CDP response and 2014 report (not needed to meet Core)	Relevancy Assessment 2016 CDP Response 2014 Comerica Sustainability Report (Sections: Approach to Sustainability, Stakeholder Engagement)
G4-35	—	a. Report the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.	—	Partial response provided in 2014 Sustainability Report, not needed to meet Core	2014 Comerica Sustainability Report (Section: Risk Management)

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G4-37	—	a. Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.	—	Partial response provided in 2014 Sustainability Report, not needed to meet Core	2014 Comerica Sustainability Report (Section: Approach to Sustainability)
G4-38	—	a. Report the composition of the highest governance body and its committees by: <ul style="list-style-type: none"> • Executive or non-executive • Independence • Tenure on the governance body • Number of each individual's other significant positions and commitments, and the nature of the commitments • Gender • Membership of under-represented social groups • Competences relating to economic, environmental and social impacts • Stakeholder representation 	—	Proxy Statement and Corporate Governance Guidelines provide updates; Full response provided in 2014 Sustainability Report, not needed to meet Core	Proxy Statement Corporate Governance Guidelines 2014 Comerica Sustainability Report (Section: Corporate Governance)
G4-39	—	a. Report whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement).	—	Full response, not needed to meet Core	Proxy Statement 2015 Annual Report
G4-40	—	a. Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members, including: <ul style="list-style-type: none"> • Whether and how diversity is considered • Whether and how independence is considered • Whether and how expertise and experience relating to economic, environmental and social topics are considered • Whether and how stakeholders (including shareholders) are involved 	—	Full response, not needed to meet Core	Proxy Statement Corporate Governance Guidelines
G4-41	—	a. Report processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders, including, as a minimum: <ul style="list-style-type: none"> • Cross-board membership • Cross-shareholding with suppliers and other stakeholders • Existence of controlling shareholder • Related party disclosures 	—	Full response, not needed to meet Core	Proxy Statement Corporate Governance Guidelines
G4-42	—	a. Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.	—	Partial response, not needed to meet Core	Proxy Statement Corporate Governance Guidelines

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G4-43	—	a. Report the measures taken to develop and enhance the highest governance body’s collective knowledge of economic, environmental and social topics.	—	Partial response in 2014 Sustainability Report, not needed to meet Core	2014 Comerica Sustainability Report (Section: Approach to Sustainability)
G4-45	—	a. Report the highest governance body’s role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body’s role in the implementation of due diligence processes. b. Report whether stakeholder consultation is used to support the highest governance body’s identification and management of economic, environmental and social impacts, risks, and opportunities.	—	Partial response, not needed to meet Core	Relevancy Assessment Corporate Governance Guidelines
G4-47	—	a. Report the frequency of the highest governance body’s review of economic, environmental and social impacts, risks, and opportunities.	—	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Approach to Sustainability) Corporate Governance Guidelines
G4-49	—	a. Report the process for communicating critical concerns to the highest governance body.	—	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Approach to Sustainability) Corporate Governance Guidelines
G4-51	—	a. Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration: • Fixed pay and variable pay: – Performance-based pay – Equity-based pay – Bonuses – Deferred or vested shares • Sign-on bonuses or recruitment incentive payments • Termination payments • Clawbacks • Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees b. Report how performance criteria in the remuneration policy relate to the highest governance body’s and senior executives’ economic, environmental and social objectives.	—	Proxy Statement provides update; Full response in 2014 Sustainability Report, not needed to meet Core	Proxy Statement 2014 Comerica Sustainability Report (Section: Corporate Governance)
G4-52	—	a. Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organization.	—	Full response, not needed to meet Core	Proxy Statement Corporate Governance Guidelines
G4-53	—	a. Report how stakeholders’ views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable.	—	Full response, not needed to meet Core	Proxy Statement Corporate Governance Guidelines

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G4-57	—	a. Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines.	—	Corporate Governance Guidelines provide update; Full response in 2014 Sustainability Report, not needed to meet Core	Corporate Governance Guidelines 2014 Comerica Sustainability Report (Section: Business Ethics)
G4-58	—	a. Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines.	—	Corporate Governance Guidelines provide update; Full response in 2014 Sustainability Report, not needed to meet Core	Corporate Governance Guidelines 2014 Comerica Sustainability Report (Sections: Business Ethics, Employee Engagement)
SPECIFIC STANDARD DISCLOSURES					
CATEGORY: ECONOMIC					
ASPECT: ECONOMIC PERFORMANCE					
G4-DMA	Generic Disclosures on Management Approach	<p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach <p>See the Financial Services Sector Disclosures document for more EC DMA requirements.</p>	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Economic Impact, Community)

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G4-EC1	Direct economic value generated and distributed	<p>a. Report the direct economic value generated and distributed (EVG&D) on an accruals basis including the basic components for the organization's global operations as listed below. If data is presented on a cash basis, report the justification for this decision and report the basic components as listed below:</p> <ul style="list-style-type: none"> • Direct economic value generated: <ul style="list-style-type: none"> – Revenues • Economic value distributed: <ul style="list-style-type: none"> – Operating costs – Employee wages and benefits – Payments to providers of capital – Payments to government (by country) – Community investments • Economic value retained (calculated as 'Direct economic value generated' less 'Economic value distributed') <p>b. To better assess local economic impacts, report EVG&D separately at country, regional, or market levels, where significant. Report the criteria used for defining significance.</p> <p>See the Financial Services Sector Disclosures document for more EC1 requirements.</p>	Yes	Key Statistics Table and 2015 Annual Report provide update; 2014 Sustainability Report provides full response for Core	Key Statistics Table 2015 Annual Report 2014 Comerica Sustainability Report (Section: Community)
G4-EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	<p>a. Report risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue or expenditure, including:</p> <ul style="list-style-type: none"> • A description of the risk or opportunity and its classification as either physical, regulatory, or other • A description of the impact associated with the risk or opportunity • The financial implications of the risk or opportunity before action is taken • The methods used to manage the risk or opportunity • The costs of actions taken to manage the risk or opportunity 	Yes	Full response for Core	2016 CDP Response Climate Change
G4-EC3	Coverage of the organization's defined benefit plan obligations	<p>a. Where the plan's liabilities are met by the organization's general resources, report the estimated value of those liabilities.</p> <p>b. Where a separate fund exists to pay the plan's pension liabilities, report:</p> <ul style="list-style-type: none"> • The extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them • The basis on which that estimate has been arrived at • When that estimate was made <p>c. Where a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage.</p> <p>d. Report the percentage of salary contributed by employee or employer.</p> <p>e. Report the level of participation in retirement plans (such as participation in mandatory or voluntary schemes, regional or country-based schemes, or those with financial impact).</p>	No	—	—
G4-EC4	Financial assistance received from government	<p>a. Report the total monetary value of financial assistance received by the organization from governments during the reporting period, including, as a minimum:</p> <ul style="list-style-type: none"> • Tax relief and tax credits • Subsidies • Investment grants, research and development grants, and other relevant types of grants • Awards • Royalty holidays • Financial assistance from Export Credit Agencies (ECAs) • Financial incentives • Other financial benefits received or receivable from any government for any operation <p>b. Report the information above by country.</p> <p>c. Report whether, and the extent to which, the government is present in the shareholding structure.</p>	No	—	—

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
ASPECT: MARKET PRESENCE					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—
G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation	a. When a significant proportion of the workforce is compensated based on wages subject to minimum wage rules, report the ratio of the entry level wage by gender at significant locations of operation to the minimum wage. b. Report whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums could be used as a reference, report which minimum wage is being used. c. Report the definition used for 'significant locations of operation'.	No	—	—
G4-EC6	Proportion of senior management hired from the local community at significant locations of operation	a. Report the percentage of senior management at significant locations of operation that are hired from the local community. b. Report the definition of 'senior management' used. c. Report the organization's geographical definition of 'local'. d. Report the definition used for 'significant locations of operation'.	No	—	—
ASPECT: INDIRECT ECONOMIC IMPACTS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Economic Impact, Risk Management)
G4-EC7	Development and impact of infrastructure investments and services supported	a. Report the extent of development of significant infrastructure investments and services supported. b. Report the current or expected impacts on communities and local economies. Report positive and negative impacts where relevant. c. Report whether these investments and services are commercial, in-kind, or pro bono engagements.	Yes	Key Statistics section provides update; 2014 Sustainability Report provides full response for Core	Key Statistics 2014 Comerica Sustainability Report (Sections: Economic Impact, Improving Banking Access and Serving the Underbanked, Supporting Environmentally Beneficial Companies and Projects, Community Reinvestment and Development, Philanthropy, Volunteerism)

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G4-EC8	Significant indirect economic impacts, including the extent of impacts	a. Report examples of the significant identified positive and negative indirect economic impacts the organization has. These may include: <ul style="list-style-type: none"> • Changing the productivity of organizations, sectors, or the whole economy • Economic development in areas of high poverty • Economic impact of improving or deteriorating social or environmental conditions • Availability of products and services for those on low incomes • Enhancing skills and knowledge amongst a professional community or in a geographical region • Jobs supported in the supply chain or distribution chain • Stimulating, enabling, or limiting foreign direct investment • Economic impact of change in location of operations or activities • Economic impact of the use of products and services b. Report the significance of the impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas.	Yes	2014 Sustainability Report provides full response for Core	Key Statistics 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Economic Impact, Improving Banking Access and Serving the Underbanked, Supporting Environmentally Beneficial Companies and Projects, Community Reinvestment and Development, Philanthropy, Supply Chain)
ASPECT: PROCUREMENT PRACTICES					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	—	2014 Comerica Sustainability Report (Section: Supply Chain)
G4-EC9	Proportion of spending on local suppliers at significant locations of operation	a. Report the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation (such as percentage of products and services purchased locally). b. Report the organization's geographical definition of 'local'. c. Report the definition used for 'significant locations of operation'.	No	—	2014 Comerica Sustainability Report (Section: Supply Chain)
CATEGORY: ENVIRONMENTAL					
ASPECT: MATERIALS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	Paper section provides update; 2014 Sustainability Report provides full response for Core	Paper 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Paper)
G4-EN1	Materials used by weight or volume	a. Report the total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by: <ul style="list-style-type: none"> • Non-renewable materials used • Renewable materials used 	Yes	Full response for Core	Paper Key Statistics Table 2015 Paper consumption data has been externally assured- 2016 CDP Response

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G4-EN2	Percentage of materials used that are recycled input materials	a. Report the percentage of recycled input materials used to manufacture the organization's primary products and services.	Yes	Full response for Core	Paper Key Statistics Table
ASPECT: ENERGY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	Energy section provides update; 2014 Sustainability Report provides full response for Core	Energy 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Energy and GHG Emissions)
G4-EN3	Energy consumption within the organization	a. Report total fuel consumption from non-renewable sources in joules or multiples, including fuel types used. b. Report total fuel consumption from renewable fuel sources in joules or multiples, including fuel types used. c. Report in joules, watt-hours or multiples, the total: <ul style="list-style-type: none"> • Electricity consumption • Heating consumption • Cooling consumption • Steam consumption d. Report in joules, watt-hours or multiples, the total: <ul style="list-style-type: none"> • Electricity sold • Heating sold • Cooling sold • Steam sold e. Report total energy consumption in joules or multiples. f. Report standards, methodologies, and assumptions used. g. Report the source of the conversion factors used.	Yes	Full response for Core In 2015, except for low carbon electricity, heat, steam or cooling that may offered as part of the regional mix of energy sources provided by local utility providers, Comerica did not purchase or generate any low or no carbon energy sources. We also did not sell any energy to others.	This GRI Index Energy Key Statistics Table 2016 CDP Response - Energy data has been externally assured
G4-EN4	Energy consumption outside of the organization	a. Report energy consumed outside of the organization, in joules or multiples. b. Report standards, methodologies, and assumptions used. c. Report the source of the conversion factors used.	Yes	Full response for Core	Energy Key Statistics Table 2016 CDP Response
G4-EN5	Energy intensity	a. Report the energy intensity ratio. b. Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio. c. Report the types of energy included in the intensity ratio: fuel, electricity, heating, cooling, steam, or all. d. Report whether the ratio uses energy consumed within the organization, outside of it or both.	Yes	Full response for Core	Energy Key Statistics Table 2016 CDP Response

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G4-EN6	Reduction of energy consumption	a. Report the amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples. b. Report the types of energy included in the reductions: fuel, electricity, heating, cooling, and steam. c. Report the basis for calculating reductions in energy consumption such as base year or baseline, and the rationale for choosing it. d. Report standards, methodologies, and assumptions used.	Yes	Full response for Core	Energy Key Statistics Table 2016 CDP Response
G4-EN7	Reductions in energy requirements of products and services	a. Report the reductions in the energy requirements of sold products and services achieved during the reporting period, in joules or multiples. b. Report the basis for calculating reductions in energy consumption such as base year or baseline, and the rationale for choosing it. c. Report standards, methodologies, and assumptions used.	Yes	Full response for Core	Energy Key Statistics Table 2016 CDP Response
ASPECT: WATER					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	Water Stewardship section provides update; 2014 Sustainability Report provides full response for Core	Water Stewardship 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Water Stewardship)
G4-EN8	Total water withdrawal by source	a. Report the total volume of water withdrawn from the following sources: <ul style="list-style-type: none">• Surface water, including water from wetlands, rivers, lakes, and oceans• Ground water• Rainwater collected directly and stored by the organization• Waste water from another organization• Municipal water supplies or other water utilities b. Report standards, methodologies, and assumptions used.	Yes	2014 Sustainability Report provides full response for Core	Water Stewardship 2014 Comerica Sustainability Report (Sections: Water Stewardship, Key Statistics Table, GRI G4 Content Index)
G4-EN9	Water sources significantly affected by withdrawal of water	a. Report the total number of water sources significantly affected by withdrawal by type: <ul style="list-style-type: none">• Size of water source• Whether or not the source is designated as a protected area (nationally or internationally)• Biodiversity value (such as species diversity and endemism, total number of protected species)• Value or importance of water source to local communities and indigenous peoples b. Report standards, methodologies, and assumptions used.	No	—	—
G4-EN10	Percentage and total volume of water recycled and reused	a. Report the total volume of water recycled and reused by the organization. b. Report the total volume of water recycled and reused as a percentage of the total water withdrawal reported under Indicator G4-EN8. c. Report standards, methodologies, and assumptions used.	No	—	—
ASPECT: BIODIVERSITY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—

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G4-EN11	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	a. Report the following information for each operational site owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas: <ul style="list-style-type: none">• Geographic location• Subsurface and underground land that may be owned, leased, or managed by the organization• Position in relation to the protected area (in the area, adjacent to, or containing portions of the protected area) or the high biodiversity value area outside protected areas• Type of operation (office, manufacturing or production, or extractive)• Size of operational site in km2• Biodiversity value characterized by:<ul style="list-style-type: none">– The attribute of the protected area or high biodiversity value area outside the protected area (terrestrial, freshwater, or maritime ecosystem)– Listing of protected status (such as IUCN Protected Area Management Categories, Ramsar Convention, national legislation)	No	—	—
G4-EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	a. Report the nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following: <ul style="list-style-type: none">• Construction or use of manufacturing plants, mines, and transport infrastructure• Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources)• Introduction of invasive species, pests, and pathogens• Reduction of species• Habitat conversion• Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level) b. Report significant direct and indirect positive and negative impacts with reference to the following: <ul style="list-style-type: none">• Species affected• Extent of areas impacted• Duration of impacts• Reversibility or irreversibility of the impacts	No	—	—
G4-EN13	Habitats protected or restored	a. Report the size and location of all habitat protected areas or restored areas, and whether the success of the restoration measure was or is approved by independent external professionals. b. Report whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures. c. Report on the status of each area based on its condition at the close of the reporting period. d. Report standards, methodologies, and assumptions used.	No	—	—
G4-EN14	Total number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	a. Report the total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk: <ul style="list-style-type: none">• Critically endangered• Endangered• Vulnerable• Near threatened• Least concern	No	—	—

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ASPECT: EMISSIONS					
G4-DMA	Generic Disclosures on Management Approach	<p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	Greenhouse Gas Emissions section provides update; 2014 Sustainability Report provides full response for Core	Greenhouse Gas Emissions 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Energy and GHG Emissions)
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1)	<p>a. Report gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent, independent of any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation (whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all).</p> <p>c. Report biogenic CO2 emissions in metric tons of CO2 equivalent separately from the gross direct (Scope 1) GHG emissions.</p> <p>d. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>e. Report standards, methodologies, and assumptions used.</p> <p>f. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source.</p> <p>g. Report the chosen consolidation approach for emissions (equity share, financial control, operational control).</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p>	Yes	Full response for Core	2016 CDP Response- Scope 1 emissions have been externally assured Greenhouse Gas Emissions Key Statistics Table
G4-EN16	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	<p>a. Report gross energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent, independent of any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation, if available.</p> <p>c. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>d. Report standards, methodologies, and assumptions used.</p> <p>e. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source, if available.</p> <p>f. Report the chosen consolidation approach for emissions (equity share, financial control, operational control).</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p>	Yes	Full response for Core	2016 CDP Response- Scope 2 emissions has been externally assured Greenhouse Gas Emissions Key Statistics Table
G4-EN17	Other indirect greenhouse gas (GHG) emissions (Scope 3)	<p>a. Report gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent, excluding indirect emissions from the generation of purchased or acquired electricity, heating, cooling, and steam consumed by the organization (these indirect emissions are reported in Indicator G4-EN16). Exclude any GHG trades, such as purchases, sales, or transfers of offsets or allowances.</p> <p>b. Report gases included in the calculation, if available.</p> <p>c. Report biogenic CO2 emissions in metric tons of CO2 equivalent separately from the gross other indirect (Scope 3) GHG emissions.</p> <p>d. Report other indirect (Scope 3) emissions categories and activities included in the calculation.</p> <p>e. Report the chosen base year, the rationale for choosing the base year, emissions in the base year, and the context for any significant changes in emissions that triggered recalculations of base year emissions.</p> <p>f. Report standards, methodologies, and assumptions used.</p> <p>g. Report the source of the emission factors used and the global warming potential (GWP) rates used or a reference to the GWP source, if available.</p> <p>See the Financial Services Sector Disclosures document for more requirements.</p>	Yes	Full response for Core	2016 CDP Response- Scope 3 emissions has been externally assured Greenhouse Gas Emissions Key Statistics Table

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G4-EN18	Greenhouse gas (GHG) emissions intensity	a. Report the GHG emissions intensity ratio. b. Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio. c. Report the types of GHG emissions included in the intensity ratio: direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3). d. Report gases included in the calculation.	Yes	Full response for Core	2016 CDP Response -Data used in the emissions intensity calculation has been externally assured Key Statistics Table
G4-EN19	Reduction of greenhouse gas (GHG) emissions	a. Report the amount of GHG emissions reductions achieved as a direct result of initiatives to reduce emissions, in metric tons of CO2 equivalent. b. Report gases included in the calculation (whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all). c. Report the chosen base year or baseline and the rationale for choosing it. d. Report standards, methodologies, and assumptions used. e. Report whether the reductions in GHG emissions occurred in direct (Scope 1), energy indirect (Scope 2), other indirect (Scope 3) emissions.	Yes	Full response for Core	2016 CDP Response - Emissions reduction calculations have been externally assured Greenhouse Gas Emissions Key Statistics Table
G4-EN20	Emissions of ozone-depleting substances (ODS)	a. Report production, imports, and exports of ODS in metric tons of CFC-11 equivalent. b. Report substances included in the calculation. c. Report standards, methodologies, and assumptions used. d. Report the source of the emission factors used.	No	—	—
G4-EN21	NOX, SOX, and other significant air emissions	a. Report the amount of significant air emissions, in kilograms or multiples for each of the following: <ul style="list-style-type: none">• NOX• SOX• Persistent organic pollutants (POP)• Volatile organic compounds (VOC)• Hazardous air pollutants (HAP)• Particulate matter (PM)• Other standard categories of air emissions identified in relevant regulations b. Report standards, methodologies, and assumptions used. c. Report the source of the emission factors used.	No	—	—
ASPECT: EFFLUENTS AND WASTE					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	Waste section provides update; 2014 Sustainability Report provides full response for Core	Waste 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Waste)
G4-EN22	Total water discharge by quality and destination	a. Report the total volume of planned and unplanned water discharges by: <ul style="list-style-type: none">• Destination• Quality of the water including treatment method• Whether it was reused by another organization b. Report standards, methodologies, and assumptions used.	No	—	—

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G4-EN23	Total weight of waste by type and disposal method	<p>a. Report the total weight of hazardous and non-hazardous waste, by the following disposal methods:</p> <ul style="list-style-type: none">• Reuse• Recycling• Composting• Recovery, including energy recovery• Incineration (mass burn)• Deep well injection• Landfill• On-site storage• Other (to be specified by the organization) <p>b. Report how the waste disposal method has been determined:</p> <ul style="list-style-type: none">• Disposed of directly by the organization or otherwise directly confirmed• Information provided by the waste disposal contractor• Organizational defaults of the waste disposal contractor <p>See the Financial Services Sector Disclosures document for more requirements.</p>	Yes	Full response for Core	Key Statistics Table Waste 2016 CDP Response - Waste data has been externally assured 2014 Comerica Sustainability Report (Sections: Key Statistics Table , Waste)
G4-EN24	Total number and volume of significant spills	<p>a. Report the total number and total volume of recorded significant spills.</p> <p>b. For spills that were reported in the organization’s financial statements, report the additional following information for each such spill:</p> <ul style="list-style-type: none">• Location of spill• Volume of spill• Material of spill, categorized by:<ul style="list-style-type: none">– Oil spills (soil or water surfaces)– Fuel spills (soil or water surfaces)– Spills of wastes (soil or water surfaces)– Spills of chemicals (mostly soil or water surfaces)– Other (to be specified by the organization) <p>c. Report the impacts of significant spills.</p>	No	—	—
G4-EN25	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally	<p>a. Report the total weight for each of the following:</p> <ul style="list-style-type: none">• Hazardous waste transported• Hazardous waste imported• Hazardous waste exported• Hazardous waste treated <p>b. Report the percentage of hazardous waste shipped internationally.</p>	No	—	—

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G4-EN26	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff	a. Report water bodies and related habitats that are significantly affected by water discharges based on the criteria described in the Compilation section below, adding information on: <ul style="list-style-type: none">• Size of water body and related habitat• Whether the water body and related habitat is designated as a protected area (nationally or internationally)• Biodiversity value (such as total number of protected species)	No	—	—
ASPECT: PRODUCTS AND SERVICES					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	2014 Comerica Sustainability Report (Section: Managing Operational Impacts)
G4-EN27	Extent of impact mitigation of environmental impacts of products and services	a. Report quantitatively the extent to which environmental impacts of products and services have been mitigated during the reporting period. b. If use-oriented figures are employed, report the underlying assumptions regarding consumption patterns or normalization factors.	No	—	—
G4-EN28	Percentage of products sold and their packaging materials that are reclaimed by category	a. Report the percentage of reclaimed products and their packaging materials for each product category. b. Report how the data for this Indicator has been collected.	No	—	—
ASPECT: COMPLIANCE					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	Environmental Risk Management section provides update; 2014 Sustainability Report provides full response for Core	Environmental Risk Management 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Risk Management)

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	a. Report significant fines and non-monetary sanctions in terms of: <ul style="list-style-type: none">• Total monetary value of significant fines• Total number of non-monetary sanctions• Cases brought through dispute resolution mechanisms b. Where organizations have not identified any non-compliance with laws or regulations, a brief statement of this fact is sufficient.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
ASPECT: TRANSPORT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	Greenhouse Gas Emissions section provides update; 2014 Sustainability Report provides full response for Core	Greenhouse Gas Emissions 2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Managing Environmental Impacts, Energy and GHG Emissions)
G4-EN30	Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce	a. Report the significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce. Where quantitative data is not provided, report the reason. b. Report how the environmental impacts of transporting products, members of the organization's workforce, and other goods and materials are mitigated. c. Report the criteria and methodology used to determine which environmental impacts are significant.	Yes	Full response for Core; Identified omission and reason for omission provided in 2014 Sustainability Report GRI Content Index	2016 CDP Response 2014 Comerica Sustainability Report (Sections: Energy and GHG Emissions, Key Statistics Table, GRI G4 Content Index)
ASPECT: OVERALL					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Environment)
G4-EN31	Total environmental protection expenditures and investments by type	a. Report total environmental protection expenditures by: <ul style="list-style-type: none">• Waste disposal, emissions treatment, and remediation costs• Prevention and environmental management costs	No	Partial response, not needed to meet Core	2016 CDP Response

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ASPECT: SUPPLIER ENVIRONMENTAL ASSESSMENT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	Partial response, not needed to meet Core	Engaging with Suppliers 2014 Comerica Sustainability Report (Sections: Risk Management, Environmentally Responsible Procurement, Environmental Screening of Suppliers)
G4-EN32	Percentage of new suppliers that were screened using environmental criteria	a. Report the percentage of new suppliers that were screened using environmental criteria.	No	Full response, not needed to meet Core	Supply Chain Sustainability
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken	a. Report the number of suppliers subject to environmental impact assessments. b. Report the number of suppliers identified as having significant actual and potential negative environmental impacts. c. Report the significant actual and potential negative environmental impacts identified in the supply chain. d. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment. e. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.	No	Partial response, not needed to meet Core	Supply Chain Sustainability
ASPECT: ENVIRONMENTAL GRIEVANCE MECHANISMS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—
G4-EN34	Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms	a. Report the total number of grievances about environmental impacts filed through formal grievance mechanisms during the reporting period. b. Of the identified grievances, report how many were: <ul style="list-style-type: none">• Addressed during the reporting period• Resolved during the reporting period c. Report the total number of grievances about environmental impacts filed prior to the reporting period that were resolved during the reporting period.	No	—	—

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
CATEGORY: SOCIAL					
SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK					
ASPECT: EMPLOYMENT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Talent Attraction, Retention, and Development)
G4-LA1	Total number and rates of new employee hires and employee turnover by age group, gender and region	a. Report the total number and rate of new employee hires during the reporting period, by age group, gender and region. b. Report the total number and rate of employee turnover during the reporting period, by age group, gender and region.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Employees, Talent Attraction, Retention, and Development)
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	a. Report the benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum: <ul style="list-style-type: none"> • Life insurance • Health care • Disability and invalidity coverage • Parental leave • Retirement provision • Stock ownership • Others b. Report the definition used for 'significant locations of operation'.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Talent Attraction, Retention, and Development)
G4-LA3	Return to work and retention rates after parental leave, by gender	a. Report the total number of employees that were entitled to parental leave, by gender. b. Report the total number of employees that took parental leave, by gender. c. Report the total number of employees who returned to work after parental leave ended, by gender. d. Report the total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work, by gender. e. Report the return to work and retention rates of employees who took parental leave, by gender.	No	—	—
ASPECT: LABOR/MANAGEMENT RELATIONS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Employees)

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G4-LA4	Minimum notice periods regarding operational changes, including whether these are specified in collective agreements	a. Report the minimum number of weeks' notice typically provided to employees and their elected representatives prior to the implementation of significant operational changes that could substantially affect them. b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
ASPECT: OCCUPATIONAL HEALTH AND SAFETY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach See the Financial Services Sector Disclosures document for more requirements.	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Health, Safety, and Wellness)
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	a. Report the level at which each formal joint management-worker health and safety committee typically operates within the organization. b. Report the percentage of the total workforce represented in formal joint management-worker health and safety committees.	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Health, Safety, and Wellness)
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender	a. Report types of injury, injury rate (IR), occupational diseases rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities, for the total workforce (that is, total employees plus supervised workers), by: <ul style="list-style-type: none">• Region• Gender b. Report types of injury, injury rate (IR), occupational diseases rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities for independent contractors working on-site to whom the organization is liable for the general safety of the working environment, by: <ul style="list-style-type: none">• Region• Gender c. Report the system of rules applied in recording and reporting accident statistics.	No	—	—
G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	a. Report whether there are workers who are involved in occupational activities who have a high incidence or high risk of specific diseases.	No	—	—

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G4-LA8	Health and safety topics covered in formal agreements with trade unions	a. Report whether formal agreements (either local or global) with trade unions cover health and safety. b. If yes, report the extent, as a percentage, to which various health and safety topics are covered by these agreements.	No	—	—
ASPECT: TRAINING AND EDUCATION					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Talent Attraction, Retention, and Development)
G4-LA9	Average hours of training per year per employee by gender, and by employee category	a. Report the average hours of training that the organization's employees have undertaken during the reporting period, by: • Gender • Employee category	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Talent Attraction, Retention, and Development)
G4-LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	a. Report on the type and scope of programs implemented and assistance provided to upgrade employee skills. b. Report on the transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Talent Attraction, Retention, and Development)
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	a. Report the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Talent Attraction, Retention, and Development)
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Diversity and Inclusion)

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G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	<p>a. Report the percentage of individuals within the organization’s governance bodies in each of the following diversity categories:</p> <ul style="list-style-type: none">• Gender• Age group: under 30 years old, 30-50 years old, over 50 years old• Minority groups• Other indicators of diversity where relevant <p>b. Report the percentage of employees per employee category in each of the following diversity categories:</p> <ul style="list-style-type: none">• Gender• Age group: under 30 years old, 30-50 years old, over 50 years old• Minority groups• Other indicators of diversity where relevant	Yes	Key Statistics Tables updates a portion of diversity metrics; 2014 Sustainability Report provides full response for Core	Key Statistics Table 2014 Comerica Sustainability Report (Sections: Corporate Governance, Diversity and Inclusion)
ASPECT: EQUAL REMUNERATION FOR WOMEN AND MEN					
G4-DMA	Generic Disclosures on Management Approach	<p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	Partial response	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Talent Attraction, Retention, and Development-including identified omissions)
G4-LA13	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation	<p>a. Report the ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.</p> <p>b. Report the definition used for ‘significant locations of operation’.</p>	Yes	Identified omission and reason for omission provided in 2014 Sustainability Report GRI Index	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
ASPECT: SUPPLIER ASSESSMENT FOR LABOR PRACTICES					
G4-DMA	Generic Disclosures on Management Approach	<p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	2014 Comerica Sustainability Report (Sections: Risk Management, Supply Chain)
G4-LA14	Percentage of new suppliers that were screened using labor practices criteria	<p>a. Report the percentage of new suppliers that were screened using labor practices criteria.</p>	No	—	—

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G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	a. Report the number of suppliers subject to impact assessments for labor practices. b. Report the number of suppliers identified as having significant actual and potential negative impacts for labor practices. c. Report the significant actual and potential negative impacts for labor practices identified in the supply chain. d. Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which improvements were agreed upon as a result of assessment. e. Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which relationships were terminated as a result of assessment, and why.	No	—	—
ASPECT: LABOR PRACTICES GRIEVANCE MECHANISMS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Employee Engagement)
G4-LA16	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms	a. Report the total number of grievances about labor practices filed through formal grievance mechanisms during the reporting period. b. Of the identified grievances, report how many were: • Addressed during the reporting period • Resolved during the reporting period c. Report the total number of grievances about labor practices filed prior to the reporting period that were resolved during the reporting period.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Employee Engagement)
SUB-CATEGORY: HUMAN RIGHTS					
ASPECT: INVESTMENT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Sections: Risk Management, Human Rights)
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	a. Report the total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening. b. Report the definition of 'significant investment agreements' used by the organization. See the Financial Services Sector Disclosures document for more requirements.	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Human Rights)

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G4-HR2	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	a. Report the total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations. b. Report the percentage of employees in the reporting period trained in human rights policies or procedures concerning aspects of human rights that are relevant to operations.	No	—	—
ASPECT: NON-DISCRIMINATION					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	Partial response, not needed for Core	2014 Comerica Sustainability Report (Section: Human Rights)
G4-HR3	Total number of incidents of discrimination and corrective actions taken	a. Report the total number of incidents of discrimination during the reporting period. b. Report the status of the incidents and the actions taken with reference to the following: <ul style="list-style-type: none">• Incident reviewed by the organization• Remediation plans being implemented• Remediation plans have been implemented and results reviewed through routine internal management review processes• Incident no longer subject to action	No		
ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—

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G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights	a. Report operations and suppliers in which employee rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of: <ul style="list-style-type: none">• Type of operation (such as manufacturing plant) and supplier• Countries or geographical areas with operations and suppliers considered at risk b. Report measures taken by the organization in the reporting period intended to support rights to exercise freedom of association and collective bargaining.	No	—	—
ASPECT: CHILD LABOR					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor	a. Report operations and suppliers considered to have significant risk for incidents of: <ul style="list-style-type: none">• Child labor• Young workers exposed to hazardous work b. Report operations and suppliers considered to have significant risk for incidents of child labor either in terms of: <ul style="list-style-type: none">• Type of operation (such as manufacturing plant) and supplier• Countries or geographical areas with operations and suppliers considered at risk c. Report measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.	No	—	—
ASPECT: FORCED OR COMPULSORY LABOR					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—

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G4-HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor	a. Report operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of: <ul style="list-style-type: none"> • Type of operation (such as manufacturing plant) and supplier • Countries or geographical areas with operations and suppliers considered at risk b. Report measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.	No	—	—
ASPECT: SECURITY PRACTICES					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	—	—
G4-HR7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations	a. Report the percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security. b. Report whether training requirements also apply to third party organizations providing security personnel.	No	—	—
ASPECT: INDIGENOUS RIGHTS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	—	—
G4-HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken	a. Report the total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period. b. Report the status of the incidents and actions taken with reference to: <ul style="list-style-type: none"> • Incident reviewed by the organization • Remediation plans being implemented • Remediation plans have been implemented and results reviewed through routine internal management review processes • Incident no longer subject to action 	No	—	—

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
ASPECT: ASSESSMENT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	—	—
<u>G4-HR9</u>	Total number and percentage of operations that have been subject to human rights reviews or impact assessments	a. Report the total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.	No	—	—
ASPECT: SUPPLIER HUMAN RIGHTS ASSESSMENT					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	—	—
<u>G4-HR10</u>	Percentage of new suppliers that were screened using human rights criteria	a. Report the percentage of new suppliers that were screened using human rights criteria.	No	—	—
<u>G4-HR11</u>	Significant actual and potential negative human rights impacts in the supply chain and actions taken	a. Report the number of suppliers subject to human rights impact assessments. b. Report the number of suppliers identified as having significant actual and potential negative human rights impacts. c. Report the significant actual and potential negative human rights impacts identified in the supply chain. d. Report the percentage of suppliers identified as having significant actual and potential negative human rights impacts with which improvements were agreed upon as a result of assessment. e. Report the percentage of suppliers identified as having significant actual and potential negative human rights impacts with which relationships were terminated as a result of assessment, and why.	No	—	—
ASPECT: HUMAN RIGHTS GRIEVANCE MECHANISMS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Sections: Human Rights, Employee Engagement)

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
G4-HR12	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	a. Report the total number of grievances about human rights impacts filed through formal grievance mechanisms during the reporting period. b. Of the identified grievances, report how many were: <ul style="list-style-type: none"> • Addressed during the reporting period • Resolved during the reporting period c. Report the total number of grievances about human rights impacts filed prior to the reporting period that were resolved during the reporting period.	No	—	—
SUB-CATEGORY: SOCIETY					
ASPECT: LOCAL COMMUNITIES					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Community)
G4-S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs	a. Report the percentage of operations with implemented local community engagement, impact assessments, and development programs, including the use of: <ul style="list-style-type: none"> • Social impact assessments, including gender impact assessments, based on participatory processes • Environmental impact assessments and ongoing monitoring • Public disclosure of results of environmental and social impact assessments • Local community development programs based on local communities' needs • Stakeholder engagement plans based on stakeholder mapping • Broad based local community consultation committees and processes that include vulnerable groups • Works councils, occupational health and safety committees and other employee representation bodies to deal with impacts • Formal local community grievance processes 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Risk Management, Improving Banking Access and Serving the Underbanked, Community)
G4-S02	Operations with significant actual and potential negative impacts on local communities	a. Report operations with significant actual and potential negative impacts on local communities, including: <ul style="list-style-type: none"> • The location of the operations • The significant actual and potential negative impacts of operations 	No	—	—
ASPECT: ANTI-CORRUPTION					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Business Ethics)

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
G4-S03	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified	a. Report the total number and percentage of operations assessed for risks related to corruption. b. Report the significant risks related to corruption identified through the risk assessment.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Business Ethics)
G4-S04	Communication and training on anti-corruption policies and procedures	a. Report the total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region. b. Report the total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region. c. Report the total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. d. Report the total number and percentage of governance body members that have received training on anti-corruption, broken down by region. e. Report the total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Business Ethics)
G4-S05	Confirmed incidents of corruption and actions taken	a. Report the total number and nature of confirmed incidents of corruption. b. Report the total number of confirmed incidents in which employees were dismissed or disciplined for corruption. c. Report the total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. d. Report public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Business Ethics)
ASPECT: PUBLIC POLICY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Public Policy)
G4-S06	Total value of political contributions by country and recipient/beneficiary	a. Report the total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary. b. Report how the monetary value of in-kind contributions was estimated, if applicable.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Public Policy)
ASPECT: ANTI-COMPETITIVE BEHAVIOR					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Improving Banking Access and Serving the Underbanked)

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G4-S07	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	a. Report the total number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant. b. Report the main outcomes of completed legal actions, including any decisions or judgments.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Improving Banking Access and Serving the Underbanked)
ASPECT: COMPLIANCE					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Risk Management)
G4-S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	a. Report significant fines and non-monetary sanctions in terms of: • Total monetary value of significant fines • Total number of non-monetary sanctions • Cases brought through dispute resolution mechanisms b. If the organization has not identified any non-compliance with laws or regulations, a brief statement of this fact is sufficient. c. Report the context against which significant fines and non-monetary sanctions were incurred.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Economic Impact, GRI G4 Content Index) 2015 Annual Report
ASPECT: SUPPLIER ASSESSMENT FOR IMPACTS ON SOCIETY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach	No	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Risk Management)
G4-S09	Percentage of new suppliers that were screened using criteria for impacts on society	a. Report the percentage of new suppliers that were screened using criteria for impacts on society.	No	—	—
G4-S010	Significant actual and potential negative impacts on society in the supply chain and actions taken	a. Report the number of suppliers subject to assessments for impacts on society. b. Report the number of suppliers identified as having significant actual and potential negative impacts on society. c. Report the significant actual and potential negative impacts on society identified in the supply chain. d. Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which improvements were agreed upon as a result of assessment. e. Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which relationships were terminated as a result of assessment, and why.	No	—	—

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ASPECT: GRIEVANCE MECHANISMS FOR IMPACTS ON SOCIETY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—
G4-S011	Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms	a. Report the total number of grievances about impacts on society filed through formal grievance mechanisms during the reporting period. b. Of the identified grievances, report how many were: <ul style="list-style-type: none">• Addressed during the reporting period• Resolved during the reporting period c. Report the total number of grievances about impacts on society filed prior to the reporting period that were resolved during the reporting period.	No	—	—
SUB-CATEGORY: PRODUCT RESPONSIBILITY					
ASPECT: CUSTOMER HEALTH AND SAFETY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	No	—	—
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	a. Report the percentage of significant product and service categories for which health and safety impacts are assessed for improvement.	No	—	—

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G4-PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes	<p>a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services within the reporting period, by:</p> <ul style="list-style-type: none">• Incidents of non-compliance with regulations resulting in a fine or penalty• Incidents of non-compliance with regulations resulting in a warning• Incidents of non-compliance with voluntary codes <p>b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.</p>	No	—	—
ASPECT: PRODUCT AND SERVICE LABELING					
G4-DMA	Generic Disclosures on Management Approach	<p>a. Report why the Aspect is material. Report the impacts that make this Aspect material.</p> <p>b. Report how the organization manages the material Aspect or its impacts.</p> <p>c. Report the evaluation of the management approach, including:</p> <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Business Ethics, Responsible Business Practices, Customer Protection and Cybersecurity, Understanding and Supporting Our Customers, Improving Banking Access and Serving the Underbanked)
G4-PR3	Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements	<p>a. Report whether the following product and service information is required by the organization's procedures for product and service information and labeling:</p> <ul style="list-style-type: none">• The sourcing of components of the product or service• Content, particularly with regard to substances that might produce an environmental or social impact• Safe use of the product or service• Disposal of the product and environmental/social impacts• Other (explain) <p>b. Report the percentage of significant product or service categories covered by and assessed for compliance with such procedures.</p>	No	—	—

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G4-PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by: <ul style="list-style-type: none">• Incidents of non-compliance with regulations resulting in a fine or penalty• Incidents of non-compliance with regulations resulting in a warning• Incidents of non-compliance with voluntary codes b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
G4-PR5	Results of surveys measuring customer satisfaction	a. Report the results or key conclusions of customer satisfaction surveys (based on statistically relevant sample sizes) conducted in the reporting period relating to information about: <ul style="list-style-type: none">• The organization as a whole• A major product or service category• Significant locations of operation	Yes	Partial response, not needed to meet Core	2014 Comerica Sustainability Report (Section: Understanding and Supporting Our Customers)
ASPECT: MARKETING COMMUNICATIONS					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none">• The mechanisms for evaluating the effectiveness of the management approach• The results of the evaluation of the management approach• Any related adjustments to the management approach	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Improving Banking Access and Serving the Underbanked)
G4-PR6	Sale of banned or disputed products	a. Report whether the organization sells products that are: <ul style="list-style-type: none">• Banned in certain markets• The subject of stakeholder questions or public debate b. Report how the organization has responded to questions or concerns regarding these products.	No	—	—
G4-PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes	a. Report the total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by: <ul style="list-style-type: none">• Incidents of non-compliance with regulations resulting in a fine or penalty• Incidents of non-compliance with regulations resulting in a warning• Incidents of non-compliance with voluntary codes b. If the organization has not identified any non-compliance with regulations and voluntary codes, a brief statement of this fact is sufficient.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)

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ASPECT: CUSTOMER PRIVACY					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Customer Protection and Cybersecurity)
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	a. Report the total number of substantiated complaints received concerning breaches of customer privacy, categorized by: <ul style="list-style-type: none"> • Complaints received from outside parties and substantiated by the organization • Complaints from regulatory bodies b. Report the total number of identified leaks, thefts, or losses of customer data. c. If the organization has not identified any substantiated complaints, a brief statement of this fact is sufficient.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Customer Protection and Cybersecurity)
ASPECT: COMPLIANCE					
G4-DMA	Generic Disclosures on Management Approach	a. Report why the Aspect is material. Report the impacts that make this Aspect material. b. Report how the organization manages the material Aspect or its impacts. c. Report the evaluation of the management approach, including: <ul style="list-style-type: none"> • The mechanisms for evaluating the effectiveness of the management approach • The results of the evaluation of the management approach • Any related adjustments to the management approach 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Risk Management, Responsible Business Practices)
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	a. Report the total monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. b. If the organization has not identified any non-compliance with laws or regulations, a brief statement of this fact is sufficient.	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: GRI G4 Content Index)
FINANCIAL SERVICES SECTOR					
ASPECT: PRODUCT PORTFOLIO			Yes		2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
FS1 (now part of Product Portfolio DMA)	Policies with specific environmental and social components applied to business lines.	<ul style="list-style-type: none"> • Policies and the body (e.g., Board of Directors) or department that approved it; • Features of the policies (e.g., content, business lines covered, geographical areas, specific standards referenced etc.); • Key risks/opportunities/impacts that each policy is intended to address; • Which policies are publicly available and where to find these policies; • How policies influence decision-making about existing or future products/services and in engagement with stakeholders 	Yes	Climate Change and Engaging with Suppliers sections provide update; 2014 Sustainability Report provides full response for Core	Climate Change Engaging with Suppliers 2014 Comerica Sustainability Report (Sections: Risk Management, Human Rights, Environment, Community Reinvestment and Development, Environmental Screening of Suppliers)

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FS2 (now part of Product Portfolio DMA)	Procedures for assessing and screening environmental and social risks in business lines.	<ul style="list-style-type: none"> The process and procedures used to screen and assess environmental and social risks, including the use of third-party, non-client consultants or other information sources for identifying and assessing risks. Where these relate to specific policies reported under Policies with specific environmental and social components applied to business lines (former FS1), this should be noted; The roles of the departments or committees responsible for implementing and monitoring the environmental and social risk assessment procedures; How outcomes influence transaction decisions (e.g., decision to decline or approve transaction, addition of preferential conditions, adding performance standards to the transaction, establishing monitor requirements, etc.); and The thresholds applied to determine whether environmental and social risk assessment is needed, including any variations by geography or across different products/services. 	Yes	Engaging with Suppliers sections provide update; 2014 Sustainability Report provides full response for Core	Engaging with Suppliers 2014 Comerica Sustainability Report (Sections: Risk Management, Human Rights, Environment, Community Reinvestment and Development, Environmental Screening of Suppliers)
FS3 (now part of Product Portfolio DMA)	Processes for monitoring clients’ implementation of and compliance with environmental and social requirements included in agreements.	<ul style="list-style-type: none"> The method(s) used for tracking clients’ fulfillment of agreed environmental and social improvement objectives; The form of this monitoring, including the frequency and duration of monitoring; and How non-compliance with agreements is addressed and the procedures that are undertaken following any breach of agreement or transaction conditions 	Yes	Engaging with Suppliers sections provide update; 2014 Sustainability Report provides full response for Core	Engaging with Suppliers 2014 Comerica Sustainability Report (Sections: Risk Management, Human Rights, Environment, Community Reinvestment and Development, Environmental Screening of Suppliers)
FS4 (now part of Product Portfolio DMA)	Processes for improving staff competency to implement environmental and social.	<ul style="list-style-type: none"> The process(es) the reporting organization uses to ensure staff managing environmental and social risks and opportunities have the competencies to implement the environmental and social policies and procedures as applied to business lines; and The recipients of these activities, the focus of the activities and whether the activities undertaken (e.g. training, mentoring etc.) are part of core training, additional or stand-alone/one-off training. 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Business Ethics, Risk Management)
FS5 (now part of Product Portfolio DMA)	Interactions with clients/investees/ business partners regarding environmental and social risks and opportunities.	<ul style="list-style-type: none"> Summary of interactions undertaken including primary topics, goals, and outcomes; The departments and/or organizations undertaking interactions; Methods adopted to prioritize topics and targets for interactions; Methods employed (e.g., face-to-face meetings, questionnaires); and The process for monitoring and following up the outcome of interactions. 	Yes	CDP response provides update, 2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Risk Management) 2016 CDP Response
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. Micro/SME/ Large) and by sector	<p>Report the following:</p> <ul style="list-style-type: none"> The value of the portfolio for each business line as a percentage of the total or as a total monetary value based on “on-balance sheet” assets; The approach used to determine whether a sector or region presents a potential high environmental or social impact; and Provide details of classifications used for regions, sizes and sectors. 	Yes	Annual Report provides update, 2014 Sustainability Report provides full response for Core	2015 Annual Report 2014 Comerica Sustainability Report (Section: Risk Management)

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FS7	Monetary value of products and services designed to deliver a specific social benefit.	Report the following: List of products and services broken down by business line (retail banking, commercial and corporate banking, insurance) for each: <ul style="list-style-type: none"> Purpose, product description and, where relevant, the target social group; Monetary value (for products) or number of transactions or customers (for services); The proportion of this value to the total monetary value for each business line. 	Yes	Partial response; Reason for omission provided in 2014 Comerica Sustainability Report GRI Index	2014 Comerica Sustainability Report (Sections: Community Reinvestment and Development, Understanding & Supporting Our Customers, Improving Banking Access and Serving the Underbanked)
FS8	Monetary value of products and services designed to deliver a specific environmental benefit.	Report the following: <ul style="list-style-type: none"> The total monetary value of specific environmental products and services by business line; and The proportion of this value to the total value of products and services for the business line. 	Yes	Full response for Core	Environmentally Beneficial Lending 2015 Annual Report
ASPECT: AUDIT			Yes		2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
FS9 (now part of Audit DMA)	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	Report the following for each business line: <ul style="list-style-type: none"> Whether the organization has implemented auditing systems for its environmental and social risk assessment policies; Any exclusions or limitations to the audit coverage of regions or products and services; Whether the audit(s) was carried out using internal/ external auditor(s); The names of any standards utilized for the audit; and Follow-up actions (if any) to overall findings of the audit(s). 	Yes	CDP response provides update, 2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Risk Management) 2016 CDP Response
ASPECT: ACTIVE OWNERSHIP			No		2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues	<ul style="list-style-type: none"> Identify those departments across the reporting organisation that interact with companies on environmental or social issues across the institution's portfolio. Identify the total number of companies across the institution's portfolio that were engaged through the interactions reported under Interactions with clients/ investees/ business partners regarding environmental and social risks and opportunities (former FS5). Quantify this engagement activity in terms of absolute numbers of companies engaged and the percentage of companies against the total number of companies in the portfolio. Report separately the percentage and number of companies held in the institution's portfolio with which the reporting organisation has engaged on environmental or social issues. 	No	—	2014 Comerica Sustainability Report (Section: Stakeholder Engagement)
FS11	Percentage of assets subject to positive and negative environmental or social screening	<ul style="list-style-type: none"> Identify who holds responsibility within the reporting organisation or within external fund managers for environmental and social screening of assets in the portfolio. Determine how the reporting organisation uses screening and what classification is used (e.g. positive, negative, best-in-class etc.) to describe the types of screens applied. Ensure that assets subject to an integrated screen (which includes 'environment' & 'social' as a factor) are included in calculating the percentages for this indicator. Ensure that assets subject to an engagement approach only and not subject to a screening process (as defined above) are not included in the calculations. Consider the ratio between own account investment and investment on behalf of a third party. Report the breakdown of the value of total assets under management at the end of the reporting period 	No	—	—

Standard Disclosure	Standard Disclosure Title	Disclosure Requirements The disclosure requirements for the selected Standard Disclosures are provided below. The G4 Implementation Manual contains explanations of how to prepare the information to be disclosed and how to interpret the various concepts in the Guidelines. Organizations should consult the G4 Implementation Manual when preparing a sustainability report.	Is this material for our report?	Comments	Page Number (or Link) Information related to Standard Disclosures required by the 'in accordance' options may already be included in other reports prepared by the organization. In these circumstances, the organization may elect to add a specific reference to where the relevant information can be found.
FS12 (now part of Active Ownership DMA)	Voting policy(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting	Report the following: <ul style="list-style-type: none"> • If any guidelines exist for voting on environmental or social issues, describe the primary aspects covered and explain circumstances under which significant deviations are allowed; • If these voting guidelines only apply to subsidiaries in the organization, then this should be stated; • The location of any publicly available voting guidelines; • The location of any publicly available voting records; and • Summary of voting practices during the reporting period including explanation of significant deviations from voting policies. 	No	—	—
ASPECT: LOCAL COMMUNITIES			Yes		2014 Comerica Sustainability Report (Stakeholder Engagement)
FS13	Access points in low-populated or economically disadvantaged areas by type.	Report the following: <ul style="list-style-type: none"> • Total number and percentage of total FI points of access available in low-populated or economically disadvantaged areas by region and by type of access; • Provide context to this data in relation to overall access to financial services in the regions reported on/provide any benchmarks; • The percentage increase and/or decrease and absolute number of points of access in these geographic areas by type during the reporting period; and • The classification that the reporting organization has used to classify regions. 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Section: Improving Banking Access and Serving the Underbanked)
FS14	Initiatives to improve access to financial services for disadvantaged people.	Report the list of initiatives to make facilities and services accessible to disadvantaged peoples. For each initiative indicate: <ul style="list-style-type: none"> • The target disadvantaged group; • The degree to which it is applied across the institution (e.g., all locations vs. only one region, all products vs. only retail banking, etc.); and • Progress made against the initiative (e.g. % of ATMs that have been converted etc.). 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Understanding and Supporting Our Customers, Improving Banking Access and Serving the Underbanked)
ASPECT: PRODUCT AND SERVICE LABELING					
FS15 (now part of Product and Service Labeling DMA)	Policies for the fair design and sale of financial products and services.	Identify policies, principles and/or codes of conduct that have been designed to ensure that the interests of the institution and its employees are aligned to the interests of existing and potential customers. This could include: <ul style="list-style-type: none"> • Product and service design policies, such as those which establish limitations of certain product features that could place the customer at undue risk (e.g. limitations on interest rates, roll-over features, fees, etc.); • Credit risk policies; • Conflict of interest policies (e.g. preventing situations where a personal interest could conflict with the interests of present or prospective customers such as remunerations packages); • Personal conduct policies; and • Employment policies, including terms and conditions of employment (i.e. as defined in employees contracts). 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Stakeholder Engagement, Business Ethics)
FS16 (now part of Product and Service Labeling DMA)	Initiatives to enhance financial literacy by type of beneficiary.	<ul style="list-style-type: none"> • Consider financial literacy initiatives to educate customers and other groups or communities on financial planning and management. • Consider the primary target group for each initiative. This may be defined in terms of demographic characteristics (e.g., youth groups, low-income individuals, immigrants, employees) or other criteria. • Report the following information for each initiative to enhance financial literacy: <ul style="list-style-type: none"> • Goals of the initiative, including subject areas targeted; • Main activities related to the initiative; and • Target group/beneficiary. 	Yes	2014 Sustainability Report provides full response for Core	2014 Comerica Sustainability Report (Sections: Customer Protection and Cybersecurity, Understanding and Supporting Our Customers, Community Reinvestment and Development, Philanthropy)