



Comerica®

2020 Corporate Responsibility

*A comprehensive review of Comerica's
environmental, social and governance
practices & progress*

Any statements in this document that are not historical facts are forward-looking statements as defined in the Private Securities Litigation Reform Act of 1995. Words such as “anticipates,” “believes,” “contemplates,” “feels,” “expects,” “estimates,” “seeks,” “strives,” “plans,” “intends,” “outlook,” “forecast,” “position,” “target,” “mission,” “assume,” “achievable,” “potential,” “strategy,” “goal,” “aspiration,” “opportunity,” “initiative,” “outcome,” “continue,” “remain,” “maintain,” “on track,” “trend,” “objective,” “looks forward,” “projects,” “models” and variations of such words and similar expressions, or future or conditional verbs such as “will,” “would,” “should,” “could,” “might,” “can,” “may” or similar expressions, as they relate to Comerica or its management, are intended to identify forward-looking statements. These forward-looking statements are predicated on the beliefs and assumptions of Comerica's management based on information known to Comerica's management as of the date of this document and do not purport to speak as of any other date. Forward-looking statements may include descriptions of plans and objectives of Comerica's management for future or past operations, products or services, and forecasts of Comerica's revenue, earnings or other measures of economic performance, including statements of profitability, business segments and subsidiaries as well as estimates of credit trends and global stability. Such statements reflect the view of Comerica's management as of this date with respect to future events and are subject to risks and uncertainties. Should one or more of these risks materialize or should underlying beliefs or assumptions prove incorrect, Comerica's actual results could differ materially from those discussed. Factors that could cause or contribute to such differences include credit risks (unfavorable developments concerning credit quality; declines or other changes in the businesses or industries of Comerica's customers, in particular the energy industry; and changes in customer behavior); market risks (changes in monetary and fiscal policies; fluctuations in interest rates and their impact on deposit pricing; and transitions away from LIBOR towards new interest rate benchmarks); liquidity risks (Comerica's ability to maintain adequate sources of funding and liquidity; reductions in Comerica's credit rating; and the interdependence of financial service companies); technology risks (cybersecurity risks and heightened legislative and regulatory focus on cybersecurity and data privacy); operational risks (operational, systems or infrastructure failures; reliance on other companies to provide certain key components of business infrastructure; the impact of legal and regulatory proceedings or determinations; losses due to fraud; and controls and procedures failures); compliance risks (changes in regulation or oversight; the effects of stringent capital requirements; and the impacts of future legislative, administrative or judicial changes to tax regulations); strategic risks (damage to Comerica's reputation; Comerica's ability to utilize technology to efficiently and effectively develop, market and deliver new products and services; competitive product and pricing pressures among financial institutions within Comerica's markets; the implementation of Comerica's strategies and business initiatives; management's ability to maintain and expand customer relationships; management's ability to retain key officers and employees; and any future strategic acquisitions or divestitures); and other general risks (impacts from the COVID-19 global pandemic; changes in general economic, political or industry conditions; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events; changes in accounting standards and the critical nature of Comerica's accounting policies; and the volatility of Comerica's stock price). Comerica cautions that the foregoing list of factors is not all-inclusive. For discussion of factors that may cause actual results to differ from expectations, please refer to our filings with the Securities and Exchange Commission. In particular, please refer to “Item 1A. Risk Factors” beginning on page 13 of Comerica's Annual Report on Form 10-K for the year ended December 31, 2020. Forward-looking statements speak only as of the date they are made. Comerica does not undertake to update forward-looking statements to reflect facts, circumstances, assumptions or events that occur after the date the forward-looking statements are made. For any forward-looking statements made in this or in any other documents, Comerica claims the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995.

TABLE OF CONTENTS

Report Section	Page Number
Infographic: Corporate Responsibility at Comerica	4
How To Use This Report	5
Our Report and the Sustainable Development Goals	6
Leadership Message and Comerica's ESG Commitment	7
Our Company	9
2020 Corporate Responsibility Awards and Recognition	10
Customers	11
Privacy & Information Protection	12
Innovation & Technology	13
ESG-Related Lending & Investment	14
Responsible Business	15
Anti-Corruption, Ethics & Countering Bribery	16
Reputation	17
Business Risk Management	18
Transparency	19
Public Policy & Government Relations	19
Colleagues	20
Talent Attraction, Development & Retention	21
Employee Engagement	22

Report Section	Page Number
Diversity, Equity & Inclusion	23
Diversity, Equity & Inclusion	24
Board Diversity	25
Environment	26
Climate Change Impacts	27
Energy & Emissions	27
Environmental Resource Management	28
Environmentally-Beneficial Lending	29
Community	30
Financial Inclusion & Financial Education	31
Community Investment & Development	32
Volunteerism & Philanthropy	33
Additional Information	34
Key Metrics Tables	35
Reporting Methodology	55
GRI Standards Content Index	56
SASB Content Index	92

Corporate Responsibility at Comerica



\$1.2
BILLION

in green loans and commitments



53%

GHG reduction; goal achieved early¹



Ranked among *Newsweek's* listing of America's Most Responsible Companies for second consecutive year



A-

Achieved score on the CDP 2020 Climate Change Questionnaire



Named Civic 50 Most Community Minded Companies for fifth consecutive year



OVER **30,000** HOURS

of volunteer time equating to **\$773,112** donated to nonprofits by Comerica colleagues

503

hosted financial education events impacting **35,765** individuals



committed over four years to National Business League to launch the Black Capital Access Program



OVER **1250**

small-business owners and entrepreneurs attended over 110 virtual Business Bootcamps

\$10
MILLION

in deposits moved to Minority Depository Institutions



TOP 100

Top 100 Corporate Knights Most Sustainable Globally for three consecutive years

84%

participation in first enterprise-wide employee engagement survey



41%

of Comerica's U.S. employees are racial/ethnic minorities



65%

of Comerica's U.S. employees are female



of Comerica's executive officers are women or racial/ethnic minorities

Data provided is for 2020, and all comparisons are to 2019 unless otherwise noted.

COVID-19 Response



\$11
MILLION

pledged to support business needs and community service organizations by Comerica Bank and Comerica Charitable Foundation



Processed more than

14,700

Paycheck Protection Program loans providing **\$3.9 billion** in funding

OVER **\$3**
MILLION

in dependent and elder care stipends to help colleagues with school and care disruptions

¹ Scope 1 and 2 real estate greenhouse gas emissions goal, which represents 99% of all Scope 1 and 2 emissions; base year 2012

Visit www.comerica.com/sustainability to view Comerica's 2020 Corporate Responsibility Report, including the sources of data listed above and more information on our corporate responsibility efforts.

HOW TO USE THIS REPORT

[Table of Contents](#)

This report presents Comerica's key updates on our 2020 Environmental, Social and Governance (ESG) performance. This report has been developed to represent a streamlined version of corporate responsibility reporting, with content focused on "Impact Topics." These topics represent those ESG-related issues most important to Comerica and to our stakeholders, as described in Comerica's [ESG Impact Assessment Report](#) and in accordance with the Global Reporting Initiative (GRI) approach to ESG reporting,

Each of the Impact Topic pages have links to associated Key Metrics and the GRI Index.

Key Metrics

To view more information on the metrics, use the Key Metrics link.

GRI Index

For additional details on Comerica's management approach and progress on specific Impact Topics, use the GRI Index link. For Impact Topics covered in more than one GRI Disclosure, the link is to the first mention of that topic in the GRI Index.

The report also contains links to success stories, resources and news items with more details on our wide-ranging commitment to raising expectations around our ESG performance.

Comerica Newsroom

Learn more about Comerica's latest news in our Newsroom.

Comerica Insights

Get Insights into a wide variety of personal, business and economic topics.

raise your expectations

OUR REPORT AND THE SUSTAINABLE DEVELOPMENT GOALS

[Table of Contents](#)

Comerica recognizes the significance of the United Nations' Sustainable Development Goals (SDGs). Content related to the SDGs is contained within our report sections as outlined below.



raise your expectations

LEADERSHIP MESSAGE AND COMERICA'S ESG COMMITMENT

[Table of Contents](#)



Curtis C. Farmer
Chairman, President and
Chief Executive Officer
Comerica Incorporated and Comerica Bank

When I assumed the role of Chairman of Comerica at the start of 2020, little did I know how significantly the world would change over the next few months. But, one thing remained constant through the challenges of 2020: Comerica's commitment to being a responsible company.

As the pandemic brought significant financial instability to our country, Comerica colleagues worked tirelessly to support the needs of our customers as our front-line workers processed more than 14,700 Paycheck Protection Program (PPP) loans in 2020. In an incredibly short period of time, our teams enhanced customer support, assisted our own colleagues challenged with balancing remote work and their personal lives, and shifted our corporate giving to address COVID response and recovery efforts critical for our communities and small businesses.

After the murder of George Floyd, we held Diversity Dialogue sessions on racial injustice where our colleagues shared their experiences, anger and tears. We recommitted to stand with our communities to right the wrongs of social injustices, wherever and whenever they occur, as we strive to be a part of the solution to build a more equitable society for all.

Our environment was no exception to the year that was 2020, with continued stresses brought on by a changing climate and its associated physical impacts in our key markets, including wildfires and severe weather events. To embrace a better understanding of our business activities' impact on climate, Comerica joined the Partnership for Carbon Accounting Financials and looks to ultimately align our portfolio with the Paris Climate Agreement. Through it all, we have remained committed to delivering responsible solutions to the challenges facing us.

raise your expectations

Comerica's ESG Commitment:

- Provide access to capital focused on underserved communities, women, minorities & small businesses
- Promote a diverse, inclusive & equitable workforce
- Invest in financial education for underserved communities
- Address climate change
- Enhance ESG-related product & service solutions

Corporate responsibility, or what is now commonly referred to as ESG, is nothing new to Comerica. We have been publishing our sustainability or corporate responsibility report annually since 2008. Long before that, we were a pioneer in issues such as bank environmental risk management and approaches to diversity and inclusion. In the summer of 2020, building on our history, we held our first meeting of Comerica's ESG Council, whose purpose is to deliver strategy and programs to maintain Comerica ESG leadership among our peers and within our industry.

More recently, our ESG Council helped define the most significant ESG issues for our company, specifically those that are most impactful for our customers and colleagues and in which we feel we can make a significant difference. We call this our ESG commitment. Having a formal ESG commitment allows us to focus the necessary resources to address these critical issues.

We are excited about the progress we have made and the work we have underway. I look forward to sharing our progress as we continue to move forward with an ongoing sense of service and dedication to do what's best for our customers, communities, colleagues and planet. There is always more work that needs to be done and we will continue to move forward in these critically important areas, with the goal of ensuring our communities have the ability to thrive now and into the future.



OUR COMPANY

- 7,870 employees
- 5 primary markets: Arizona, California, Florida, Michigan and Texas
- Located in 7 of the 10 largest cities in the U.S. including Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas. Comerica Bank is the 16th largest U.S. bank as of 12/31/20. Comerica focuses on helping people and businesses be successful. In addition to Texas, Comerica locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico. With origins dating back to 1849, Comerica has been dedicated to serving the financial needs of our customers and communities for over 170 years.

At Comerica, relationship-based banking means we have a long-term value-creation approach that leverages our long-tenured, experienced team. We recognize that our impact extends well beyond our company. We seek to engage with our stakeholders and respond to their needs in not only economic terms, but in ways that address environmental, social and governance (ESG) issues as well.

STAKEHOLDER ENGAGEMENT AND ESG IMPACT ASSESSMENT

Comerica details how we assess ESG issues, including how we engage with stakeholders, our impact assessment process, and our impact matrix, in our [ESG Impact Assessment Report](#).

Visit [Comerica.com](https://www.comerica.com) and read the [2020 Annual Report](#) for more details about Comerica.

ESG Impact Assessment
Report

CORPORATE RESPONSIBILITY AWARDS AND RECOGNITION

[Table of Contents](#)

Comerica is pleased to be recognized for our work as a responsible company. Where available, more details can be reviewed by clicking on the highlights below:

Ranked in Global 100 Most Sustainable Corporations in the World by <i>Corporate Knights</i>	Ranked among <i>Newsweek's</i> listing of America's 100 Most Responsible Companies	12th consecutive year on the FTSE4Good Index	One of <i>Barron's</i> 100 Most Sustainable Companies in the United States
11th year listed on the <i>DiversityInc</i> Top Regional Companies for Diversity list (ranked 3rd in 2020)	Listed on The Civic 50 by Points of Light, a list of the top 50 most community-minded companies in the U.S. for 5 th consecutive year	3rd Consecutive Year listing on <i>Professional Women's Magazine</i> Best of the Best list for Supplier Diversity Programs	Listed on <i>Minority Business News USA's</i> Best of the Decade in Supplier Diversity
ATD National Excellence in Practice Award (2021) Leadership Category- Comerica Emerging Leaders Program	Named to <i>Hispanic Network Magazine's</i> 2021 Best of the Best for Financial and Banking Companies	Listed in Top 50 Best Companies for Latinas to Work for in the U.S. by <i>LatinaStyle</i> ; the 10 th time Comerica has received the honor	CDP Supply Chain Engagement Leader for its efforts to evaluate environmental sustainability within its supply chain
Achieved perfect Score of 100 for 7th consecutive year on Human Rights Campaign Foundation's Corporate Equality Index	Named to <i>Black EOE Journal</i> 2020 Spring Best of the Best Early List for Top Financial and Banking Companies	11th Gold-Level Veteran-Friendly Employer certified in Michigan by Michigan Veteran Affairs Agency for its extensive efforts to recruit, train and retain military veterans	Texas Bankers Foundation Leaders in Financial Education (LIFE) Award for Comerica's partnership with the EMPOWER Series, Inc. financial education and self-development coaching and counseling efforts

CUSTOMERS



Small Business RISE! Program

2020 Customer PPP Support

Comerica Works - Financial Fundamentals for Business

Comerica Insights - Customer Education

Comerica provides products and services to meet the financial needs of our customers and our three business segments — The Commercial Bank, The Retail Bank and Wealth Management — are strategically aligned to deliver the right support to meet our customers' requirements.

At Comerica, we strive to deliver experiences that exceed our customers' expectations and proactively understand their needs. We also use the Comerica Customer Promise to guide interactions with current and potential customers and provide them with the service, knowledge and experience they desire, all in an effort to raise the expectations of what a bank can be.

As a reflection of this commitment, in 2020 we established the role of Chief Experience Officer and a dedicated customer experience management practice. The actions support Comerica's relationship-focused approach to business by developing robust customer insights and managing the customer journey.

We are also committed to helping small businesses grow and prosper. Banking centers and Business Banking teams are located in areas where small business customers are concentrated, serving those customers with under \$30 million in annual revenues with our relationship-based approach. Our RISE! Initiative is also aimed at directly supporting the growth of small businesses in our communities.

As a result of the COVID-19 pandemic, a critical part of meeting our customers' needs in 2020 revolved around the Paycheck Protection Program (PPP). A highly dedicated team of colleagues worked to process more than 14,700 applications. This was particularly impactful for small businesses, with 89% of our processed PPP loans going to businesses with fewer than 50 employees. Additional metrics and success highlights are included within the Customers section.

Our customers' trust in Comerica is contingent on our success in safeguarding their privacy and financial information. Increasingly, this involves investing in measures to prevent unauthorized access to our information systems. We are committed to maintaining our customers' trust and continually evaluate and enhance our cybersecurity systems to safeguard customer information, protect against fraud attempts and provide a high level of safety and protection. Our industry faces many challenges due to the constantly evolving nature of security technology, with attempts to compromise customers' privacy increasing in both frequency and sophistication. In response, we participate in several industry-wide initiatives to keep abreast of new fraud trends, develop appropriate countermeasures and share this intelligence with our colleagues, customers and community members, as appropriate.

Our engagements with external stakeholders reveal that customer privacy and protection — defined as securing customer data, confidentiality and physical safety — is one of the most important priorities, and cybersecurity was identified as a topic critical to our business success. This reinforces the fact that failure to properly manage our customers' privacy could result in significant risks to Comerica, including financial losses, reputational risk and fines or penalties due to non-compliance. Accordingly, privacy and information protection are managed and discussed together in this section. For further insight into this issue, see Item 1A (Technology Risks, page 16-17) in our [2020 Annual Report](#). Privacy and information protection, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Enterprise Information Protection Framework.

Comerica's Security
Commitment

Comerica's Privacy
Practices and Policy

Cyber Security and
Fraud Educational
Resources

Comerica Fraud Center

Pandemic Fraud
Prevention



252% Real Time Payments*

**39% Click & Capture
Mobile Deposits***

**14% Number of Mobile
Banking Users***

At Comerica, we utilize technology and innovation to enhance our organization and strengthen our relationship-based approach to banking. We are focused on using innovation to design digital and technological solutions to meet the needs of our customers, employees and the marketplace. Technology teams work closely with business partners across the organization to respond to the unique requirements of our portfolio of diverse banking products. We strive to provide an optimal technology experience for our customers and encourage a continuous learning culture to keep pace with technology developments.

In 2020, our teams responded to the challenges of the COVID-19 pandemic by accelerating innovation and creatively generating unique and responsive solutions. In addition, we remained steadfast in our efforts to provide uninterrupted banking services and ensure customer security was maintained. Technology teams adapted to the changing demands of this new business climate and engineered innovative solutions on both a temporary and permanent basis.

To accommodate the PPP, our technology teams created new computer interfaces for customers, built automation to replace manual application-processing, and engineered a permanent infrastructure which could accommodate an unpredictable demand for loans along with the evolving requirements of the Small Business Administration.

Our progress in 2020 reflects Comerica's ongoing commitment to innovation. Comerica's adaptation to a culture of ingenuity has become the basis for our future, as we set goals to promote innovation throughout our organization. Our colleagues are determined to continually identify opportunities for innovation and build technological solutions for a digital transformation.

* Revised year-end 2020 innovation and technology metrics (updated on 8/31/21)

ESG-RELATED LENDING & INVESTMENT

[Table of Contents](#)

Environmental, Social and Governance (ESG)-related business activities refer to the ways that a business enhances society through its products, people and practices. At Comerica, ESG-related business activities include supporting diverse segments of our markets, lending to environmentally beneficial companies and projects, and our community investments and development work.

In the summer of 2020, Comerica established our ESG Council. Made up of key senior leaders, this group is advancing Comerica's mission to drive long-term value by executing our ESG strategy with the vision of being a leader among our peers. Two of our key priorities are to provide access to capital focused on underserved communities, women, minorities and small businesses and enhance our ESG-related product and service solutions.

Also in 2020, Comerica began evaluating the climate impacts of its own portfolios by joining the Partnership for Carbon Accounting Financials (PCAF). Our work to better understand and disclose the climate impacts associated with lending activity will assist in moving Comerica toward alignment with the goals of the Paris Climate Agreement.

For details on how we support ESG-Related Lending & Investment at Comerica, refer to the report section links provided below.

Environmentally Beneficial Lending



Community Investment & Development



Business Resource Groups



RESPONSIBLE BUSINESS

[Corporate Governance](#)

[2020 Annual Report](#)

[2021 Proxy Statement](#)

Since 1849, a sustained commitment to integrity has remained fundamental to our business success.

We exemplify our Core Values in daily interactions with customers, and maintain high standards of ethics and accountability for our Board, leadership and colleagues. Day-to-day operations are closely linked to our corporate responsibility efforts through our focus on ethics, good governance and responsible business practices, which benefit our stakeholders.

The following sections of this report provide examples of our strong corporate governance approach:

- Anti-Corruption, Ethics and Countering Bribery efforts create accountability at all levels of the organization;
- Reputation encompasses the collective perception of our company based on our conduct and business practices;
- A holistic approach to Business Risk Management helps us focus on long-term sustainable performance; and
- Public Policy and Government Relations efforts establish how we comply with and guide development of regulation in our industry to promote good business practices and customer stewardship.

Metrics and success highlights from 2020 are included within this Responsible Business section. For more information on our corporate governance guidelines, management and performance, refer to links to left.

To remain one of the leading financial institutions in the United States, we strive to instill trust and confidence in our customers, colleagues, shareholders and business partners by demonstrating the highest standards of ethics and integrity.

Our business units undergo annual risk assessments to test the effectiveness of their individual compliance risk controls, including those for new products and vendors. We use the results from internal audits, internal investigations and monitoring systems to assess the effectiveness of our corporate compliance program. External regulatory examinations and changes to governmental guidance also help identify ways to enhance our compliance program.

In addition, money laundering, bribery and corruption pose significant potential risks to Comerica, such as damaging our business and reputation or provoking regulatory scrutiny. Countering the potential for such activity is a high priority. Since certain lines of business and product offerings inherently carry more risk of corruption, Comerica's Bank Secrecy Act/Anti-Money Laundering risk assessment considers risk factors, such as customer geography and demographic information, as well as mode of interacting with customers (i.e., in-person or online) to reduce risk.

For more details on our anti-corruption, ethics & countering bribery efforts, see [Comerica's Governance page](#) on Comerica.com.

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

Anti-Money Laundering Compliance



CORE VALUES

Customer-Centricity
Collaboration
Integrity
Excellence
Agility
Diversity
Involvement

Comerica has earned a reputation for delivering a premium blend of service and value in the financial services industry and is recognized by leading organizations across corporate responsibility topics, including diversity, equity and inclusion, sustainability and supplier engagement.

Given our mission to be the highest performing, most respected and most desired bank in the markets we serve, we understand we can't be successful without the trust of our stakeholders. Our reputation is impacted by numerous internal and external factors, ranging from customer service and community development to corporate governance and diversity. By living our Core Values, we put ourselves in the best position to maintain our strong reputation within the financial services industry and in the markets we serve.

America's
Most
Responsible
Companies
2020



FTSE4Good

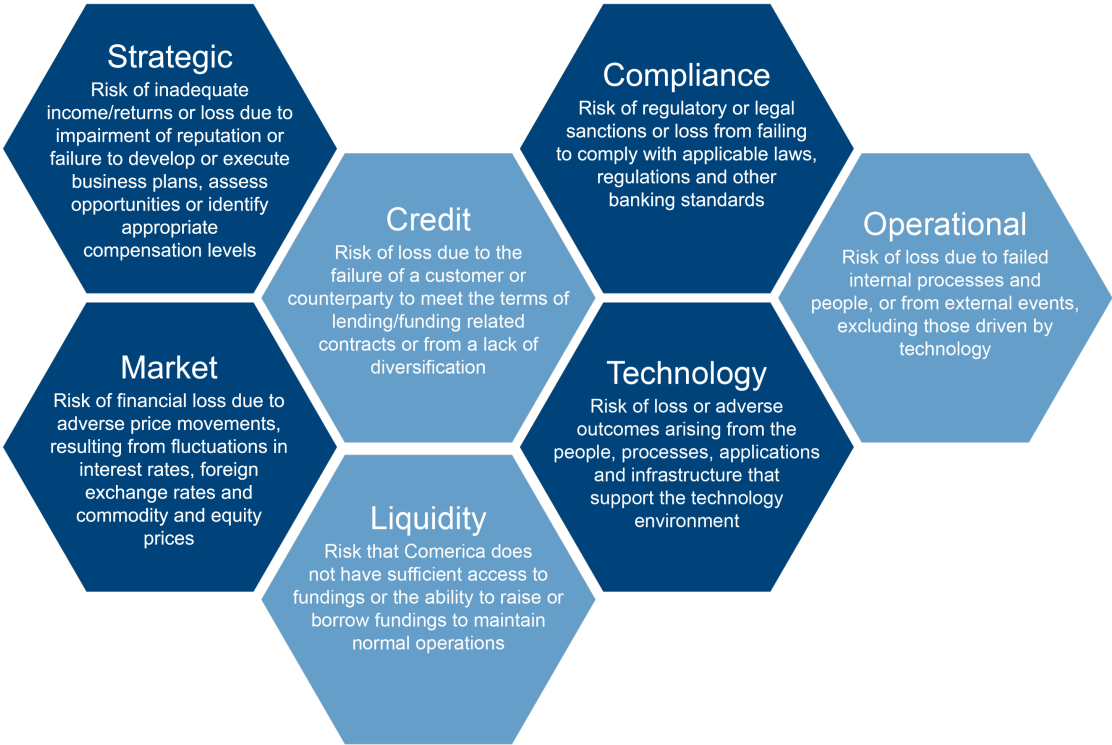


Comerica Bank



Risk management has always been a priority at Comerica. Given the pace of change in our current world, the rapidly evolving regulatory expectations and the highly competitive business environment, it is more important than ever. Our consistent and conservative approach to banking has fostered a robust risk management culture at Comerica. This makes us strong and resilient, benefiting our stakeholders and our business. Our approach is not to eliminate risk, but to understand, manage and provide careful consideration for the risks we elect to accept. In this way, we appropriately balance revenue targets with our corporate strategy, risk appetite, mission and Core Values.

Comerica’s risk management practices are guided by the Enterprise Risk Management Framework, which is approved annually by the Enterprise Risk Committee of our Board of Directors. The framework provides a common platform to evaluate all risks and mitigating controls. It also aggregates granular risks across the organization for a broader understanding of our corporate risk profile.



The effectiveness of our risk management framework is regularly reviewed through internal and external audits, examinations by federal and state regulators, self-assessments and benchmarking. We conduct a myriad of risk assessment exercises across the organization, including regular stress-testing and scenario assessment processes for significant identified risks to our company.

For more on risk identification and management, see our [2020 10-K](#), including Item 1A (Risk Factors) and the Risk Management section starting on page F-21.

TRANSPARENCY

[Table of Contents](#)

Transparency is one of the most significant topics to our stakeholders as it impacts our reputation and instills confidence and trust in our company. Our [Senior Financial Officer Code of Ethics](#) requires senior officers to provide information that is accurate, complete, objective, relevant, timely and understandable. Comerica provides robust financial, environmental and social reporting, utilizing well-understood metrics to demonstrate our performance, progress and successes. We are committed to implementation, control and maintenance of systems and procedures to obtain and verify information we disclose.



Since 2008, Comerica has fostered Environmental Social Governance (ESG) transparency by providing annual updates on our commitment to corporate responsibility. We have consistently used the Global Reporting Initiative (GRI) Standards and frameworks, which identify the most significant issues for Comerica and our diverse stakeholders. With a growing stakeholder desire for transparency around the impacts of climate change, particularly from the financial services industry, we were pleased that the CDP recognized Comerica with leadership level "A-" rating on its 2020 Climate Change Questionnaire. Our [Reporting Methodology](#) provides additional details on our ESG disclosure approach.

PUBLIC POLICY & GOVERNMENT RELATIONS

Legislation passed at the state and federal levels of government can have a big impact on our products and services. As such, we closely monitor the development of public policies that directly affect our business and industry. Our advocacy efforts are focused at the federal level and in our key market states. Comerica meets with elected officials and engages with national and state financial services trade associations to advocate on behalf of the regional banking industry.

Also, the Comerica Political Action Committee (PAC) annually solicits contributions from eligible employees and makes bipartisan contributions — in compliance with local, state and federal election laws — to political candidates and committees who understand and support Comerica's pro-banking, pro-business philosophy. All political contributions and guidelines are developed by the Government Relations Department and approved by a separate PAC Board comprised of senior executives from across the company. Comerica PAC contributed \$376,000 to political candidates and committees in 2020. In early 2021, following the troubling events at the U.S. Capitol, we paused contributions as the PAC Board worked to reevaluate the criteria for candidates to receive support from the Comerica PAC. For more details, visit the [Political Activities and Contributions](#) section of Comerica.com.

COLLEAGUES



Banking is a business that relies heavily on personal relationships and the quality of service provided by employees. One of Comerica's strengths has always been its colleagues. To meet and exceed our customers' expectations, we strive to make Comerica the preferred place to work in our markets.

We recognize our colleagues' hard work and are dedicated to fostering a diverse and inclusive workplace. We offer competitive wages and benefits and are committed to providing a healthy, safe and engaging working environment. To help build trust and loyalty, we strive to communicate regularly, openly and honestly with colleagues, and offer opportunities for growth through learning and development programs. Our commitment to attracting and retaining top talent provides customers with high-quality banking relationships.

As Comerica colleagues, we are united by a strong desire to help our customers and communities prosper. But we're also bound by something far more powerful: a passionate and unwavering commitment to each other.

Our core values define who we are and form the foundation of a unique, inclusive and collaborative culture that sets us apart from other institutions, ensuring that the choices we make and the actions we take are always in the best interests of our customers.

In this way, every day, we are raising the expectations of what a bank can be.

- Comerica's Colleague Promise

TALENT ATTRACTION, DEVELOPMENT & RETENTION

[Table of Contents](#)

Our colleagues are critical to our business success, and we prioritize creating a culture where colleagues can thrive. Comerica's recruitment practices enable us to hire the best candidates with appropriate skill sets and values, pay competitive wages, and provide benefits that fit our demographics. Comerica's learning and development activities help assure top quality training and development for all colleagues, from compliance to skills training, and support managers and employees through counseling and facilitating talent management reviews. Diversity, equity and inclusion is an integral part of Comerica's attraction, recruitment and promotion efforts, and we have built-in steps to ensure diversity in our talent pipeline.

Comerica Careers

Gold Level Veteran-Friendly
Employer



of colleagues took advantage
of skills training in 2020



in dependent and elder care
stipends to help colleagues
with school and care disruptions

Attracting New Colleagues: Comerica measures the success of our talent acquisition strategy on speed and quality of acquisition, diversity of applicant pool, and new colleagues' retention and overall performance metrics. Each of these metrics is tracked for our key business lines. Sourcing strategies and support structures are modified to ensure that performance targets are met consistently.

Developing Colleagues: We have created internal programs to support professional development, including Comerica University, an internal Leadership Development and Emerging Leaders Programs, Com-Tech college courses to help re-skill Technology colleagues, a Managing Essentials Certificate series for managers, and organizational change management learning for all colleagues.

Retaining Colleagues: In addition to cash compensation, and health, welfare and retirement benefits, Comerica provides a wide range of supplemental programs and special services to help colleagues meet their personal needs and goals. In 2020, Comerica added broad-based financial coaching, an Emergency Leave Policy and enhanced mental health coverage. These offerings provide additional support for colleagues to meet financial goals and improve overall well-being.

Comerica operates in a dynamic and competitive industry, which makes our colleagues critical to our success. Comerica colleagues are highly engaged as evidenced by strong employee engagement survey participation and scores. Engaged employees are typically higher performing and more productive. Among the results, it was clear colleagues deeply believe in Comerica's mission and values and that leaders, managers and colleagues respect and collaborate well together. Open lines of communication between colleagues and leaders are an integral part of our culture. We believe strongly that this communication approach assists us in maintaining a great work environment, one that is collaborative and in which colleagues are treated with dignity and respect. We also know that employees can be inspired to work for purpose-driven organizations with which they share values. Employee participation is a powerful driver of company engagement as colleagues become active in our diversity and environmental sustainability efforts, and in supporting our communities through volunteerism.



Sustainability Engagement

We engage colleagues by harnessing their enthusiasm and commitment to drive our environmental sustainability efforts in a broad range of areas from supporting green lending to recycling office supplies. We educate colleagues on sustainability through internal communications and discussion boards, green office teams, sustainability-focused work groups and training. New hires are required to complete mandatory sustainability awareness training, with 100% of Comerica's 2020 new hires completing the course. A cornerstone of our engagement on sustainability is Comerica's voluntary Master of Sustainability Awareness (MSA) program, which is designed to move interested Comerica colleagues from learning about sustainability to sharing what they have learned and putting it into action. MSA engages in activities that both support Comerica's sustainable business strategy and bring sustainability to colleagues' personal lives. As of 2020, 515 Comerica colleagues are participating in the MSA Program.

Diversity, Equity & Inclusion, Financial Education and Volunteer Engagement

Comerica employees participate in a variety of diversity, volunteer and financial education activities. For more details, go to the [Diversity, Equity & Inclusion](#) section for diversity-related employee engagement or to the [Community](#) section for volunteerism, financial education and other community-related employee engagement.

DIVERSITY, EQUITY & INCLUSION

Comerica's Statement On Diversity & Inclusion

As Comericans, we are unified in our desire to deliver ongoing growth and shareholder value. Yet we are also bound together by something more powerful and distinctive: an unwavering commitment to each other. We believe that our character and values define our Comerica work experience and form the foundation of a unique, caring, inclusive and collaborative culture. This appreciation for our internal relationships is manifested in our relationships with our customers and serves to distinguish us from other financial institutions. In this way, every day, we are raising the expectations of what a bank can be.

As one of Comerica's Core Values, our respect for diversity permeates everything we do. Our diversity standards recognize behavior that:

- Uses and values similarities and differences in people to create a work environment that encourages creative thinking and solutions.
- Stands up for social justice and racial equality for all communities and counters policy and actions that create inequities within our communities.
- Recognizes and leverages the benefits from a broad range of ideas, viewpoints, and backgrounds working together to produce superior products and services for a diverse marketplace.
- Embraces the inclusion of all talented and qualified individuals, regardless of differences in beliefs, experiences, backgrounds or physical characteristics.
- Treats all colleagues, customers and suppliers fairly, with dignity and respect.



of Comerica's U.S. employees
are racial/ethnic minorities



of Comerica's executive
officers are women or
racial/ethnic minorities



of Comerica's U.S.
employees are female

Diversity, Equity & Inclusion is a key Environmental Social Governance (ESG) Impact Topic for Comerica and since 2017, we have shared a stand-alone comprehensive Diversity, Equity & Inclusion Progress Report. Our most recent Report includes detailed information on:

- Board of Directors, including information on board diversity metrics;
- Diversity, Equity & Inclusion Accountability and Commitment, including information on "Our Statement as We Stand for Social Justice and Racial Equality," the Executive Diversity Committee, and the four Diversity, Equity & Inclusion Pillars;
- Colleagues, including information on workforce metrics, attracting diverse talent, and connecting with, educating and enhancing the careers of colleagues;
- Customers, including information on reaching diverse customers;
- Suppliers, including information on our supplier diversity approach and metrics; and
- Community, including information on Comerica's volunteerism, grant relief efforts and external partnerships.

To learn more about Comerica's efforts around Diversity, Equity & Inclusion, please review Comerica's Diversity, Equity & Inclusion Progress Report.



**LAUNCHED DIVERSITY DIALOGUE
SESSIONS AND ALLY SERIES**

\$42 MILLION

in annual spend with diverse suppliers

**Comerica's Most Recent Diversity,
Equity & Inclusion Progress Report**

**Comerica's Investment in
Diversity, Equity & Inclusion**

Comerica strives to have a diverse Board that represents the interests of four of Comerica's core constituencies: shareholders, employees, customers and communities. The Board's Governance, Compensation and Nominating Committee considers diversity broadly in assessing potential director nominees. For example, the committee seeks nominees with a broad range of experience, professions, skills, geographic representation and/or backgrounds. Nominees are not discriminated against on the basis of race, religion, national origin, sexual orientation, disability or any other basis as proscribed by law.



In 2020, 91% of Comerica's Board of Directors are independent and Comerica's female Directors held key Board leadership positions, including Independent Facilitating Director and Governance, Compensation and Nominating Committee chair. One of Comerica's racial/ethnic minority Directors chairs the Enterprise Risk Committee.

Our [Corporate Governance Guidelines](#) outline the Board's evaluation process, which includes an annual self-evaluation of the full Board and its committees that focuses on areas for improvement.



ENVIRONMENT

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

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

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

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

CLIMATE CHANGE IMPACTS

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

ENERGY & EMISSIONS

To actively reduce climate change risks associated with our operations, we focus our efforts on two key areas: reducing energy use and reducing GHG emissions. In addition to multiple environmental benefits, there are also business benefits including creating a more desirable workplace, improving colleague retention and attraction, customer appeal and company profitability.

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

2020 MI BATTLE OF THE BUILDINGS FINANCIAL SERVICES CATEGORY WINNER

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

GOAL
ACHIEVED
IN 2013

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

GOAL
ACHIEVED
IN 2016

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

GOAL
ACHIEVED
IN 2020

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

53%
REDUCTION
AS OF 2020

* Base year 2008; includes Scope 1 & 2 location-based real estate emissions
** Base year 2012; includes Scope 1 & 2 location-based real estate emissions

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

PAPER

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

WASTE

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

WATER STEWARDSHIP

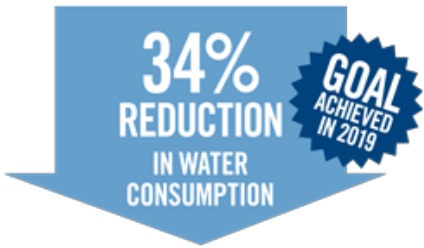
Water stewardship is important in light of our presence in both water-abundant and water-stressed regions. Our approach continues to focus on using water more efficiently and closely monitoring our water consumption and costs.



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



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



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

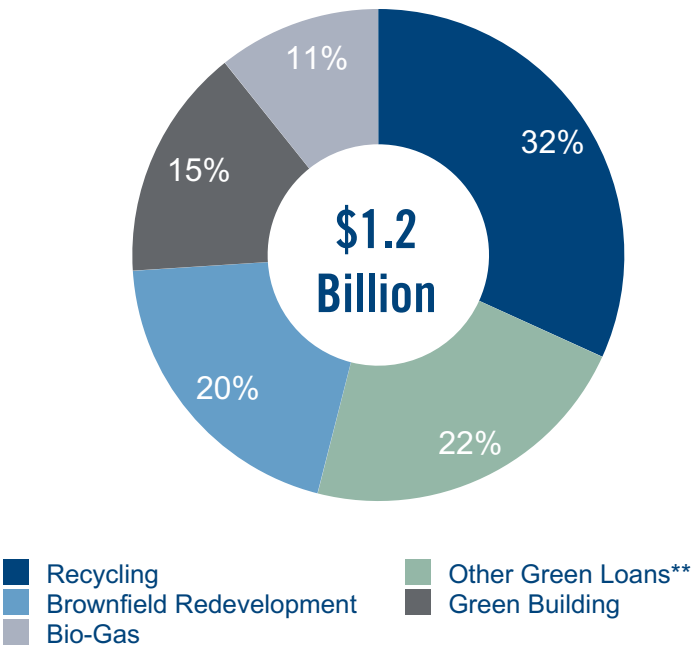
Refer to our [GRI Index](#) for more details on how the COVID-19 pandemic impacted our management of paper, waste and water.

ENVIRONMENTALLY BENEFICIAL LENDING

[Table of Contents](#)

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

*Environmentally Beneficial Loans and Commitments by Category**



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

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

Comerica Supports Green Business

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

COMMUNITY

A woman with dark hair is shown from the chest up, looking down at a book she is holding. Below her, there is a tall stack of several books. The background is a solid blue color.

The vibrancy of the communities we serve is vital to our growth, and the economic development in these communities is a key element of our mission. Our ongoing vision to assist entrepreneurs in starting and managing their businesses has been realized through our support of Community Development Financial Institutions (CDFIs), Technical Assistance Providers, small business lending, and affordable housing and new market tax credit investments. Additionally, we partner, volunteer with and donate to nonprofit organizations in the communities where we operate to help maximize our positive impact.

Thriving communities help us succeed. Our community investment strategy is designed to create shared value by supporting the viability and well-being of the businesses and people that make up the communities where we operate. We focus our efforts through small business and community development lending programs and investments in programs, which positively change the economic landscape of the communities we serve.

To further our community commitment, in January 2020, Comerica appointed Irvin Ashford, Jr. as Comerica's [Chief Community Officer](#) and in October 2020, Beatrice Kelly joined Comerica as [Director of Community Development Lending](#).

For more on Comerica's community investment and partnerships and information on our COVID-19 community response, visit the [Comerica Bank Community Update-COVID-19 Response Report](#) or the [Corporate Responsibility web page](#).

FINANCIAL INCLUSION

Comerica thrives when our customers are successful and our communities prosper. We can support this aim and drive shared value by providing financial services that enable customers to access their money easily, and provide vehicles to save as well as borrow. We work hard to expand financial inclusion, including improving accessibility of our banking centers, providing remote banking channels, such as Comerica Web Banking® and Comerica Mobile Banking®, and providing appropriate products to help meet the needs of the underbanked.

We have tailored products, such as the Comerica Secured Credit Card, which is an entry-level, cash-secured credit card that helps those who do not qualify for a traditional credit card build credit history. In addition to helping expand our customers' access to credit, we offer the Access Checking account with a flat monthly fee or no fee with direct deposit. Comerica Bank is also the exclusive issuer of the Direct Express® debit card for federal benefit recipients.

FINANCIAL EDUCATION

We want to serve as a trusted resource for financial education, especially for the unbanked and underbanked portions of the communities within our key markets. Comerica provides financial support to nonprofit organizations dedicated to developing financially literate communities, including organizations such as Project Still I Rise and the Arizona Hispanic Chamber, to teach personal finance basics to people in underbanked areas. Comerica continues to expand its Comerica \$ense financial education programs to include Money \$ense, Business \$ense, Education \$ense, Sport \$ense and Elder \$ense.

503
hosted financial
education events
impacting
35,765
individuals

Comerica's Financial Education Brigade (CFEB) is designed to meet the growing need for more financial education in our communities. This team of trained Comerica colleagues is committed to delivering on the Comerica Promise in low- and moderate-income communities in all our markets. The CFEB capitalizes on what we have been doing for years, reaching across business lines to help address critical needs in the community.

Comerica Financial
Education Center

Business \$ense Boot Camp
With GROW Support

COMMUNITY REINVESTMENT ACT (CRA)

In 2020, Comerica originated \$1.2 billion in community and economic development loans. The bank’s community development strategy is a collaborative effort between Executive Management and the External Affairs Department that consists of the Chief Community Officer, External Affairs Managers, CRA Data and CRA Compliance officers. CRA-related guidance and recommendations are made based on feedback received from our Community Development Advisory Councils, other trusted community partners, data analysis, peer analysis, research related to current market conditions, and the results of our CRA examinations.



Comerica participates in peer bank meetings across our markets to benchmark our performance and share best practices in addressing CRA regulations and to achieve the greatest possible impact in our community development efforts. We also require new External Affairs staff to take our in-house CRA training. For more information, refer to the [Community Reinvestment Act](#) page on Comerica.com.

Comerica Partners
With Minority Deposit
Institutions

INVESTING IN NEIGHBORHOOD REVITALIZATION AND SMALL BUSINESSES

To support the small businesses and entrepreneurs that make up the backbone of local economies, Comerica provides loan capital to microenterprise loan funds and community development financial institutions where we operate. We also look for opportunities to fund organizations that provide technical assistance and financial education to small business.



Through investments in tax credit-financed real estate, Comerica provided \$85 million of equity in 2020 to community development projects, which address specific needs in low-income communities by creating quality housing, nearby employment opportunities and social/educational services.

VOLUNTEERISM

We encourage colleagues to share their time and expertise to support our commitment to the communities in which we operate. Our volunteer programs help drive Comerica's success by improving the lives of individuals, groups and communities in which we do business by building and managing relationships and strategic partnerships. Our colleague volunteers give their time and talent generously by participating on boards, conducting financial education training and providing services requested by local community groups, all helping to improve the communities we serve.

 OVER **30,000** HOURS
of volunteer time equating to
\$773,112 donated to nonprofits by
Comerica colleagues

PHILANTHROPY

CIVIC 50 Listed for 5th Consecutive Year

Through our Philanthropic Investment, we are raising expectations in the communities in which we operate. Our Core Values of Collaboration and Involvement have led us to achieve strong partnerships with charitable organizations within our markets through our financial, in-kind and volunteer support.

 **\$11** MILLION

pledged to support business needs
and community service organizations
by Comerica Bank and Comerica
Charitable Foundation

Our three-fold mission is to (1) target issues that are important to both our communities and the company, (2) address diversity needs, and (3) create pride and loyalty for Comerica colleagues. It is our priority when giving to assist low- and moderate-income individuals and families in a manner that aligns with our overall business approach and supports our strategic direction as a financial services provider. For more information, visit [Comerica Charitable Giving](#) on Comerica.com.

 **\$1** MILLION committed over four
years to National
Business League to
launch the Black Capital
Access Program

We also support the Comerica Cares Fund Relief Program, which includes individual colleague donations supplemented by Comerica to help our colleagues experiencing financial hardships.

Comerica Invests in COVID Relief Efforts



ADDITIONAL INFORMATION

This Additional Information section includes important supporting documentation for the 2020 Comerica Corporate Responsibility Report, including:

1. Our Key Metrics Tables, which include tracking metrics and showcase our management of the Impact Topics. Our Key Metrics tables have been broken down by Report Section (dark blue headings) and Impact Topic (light blue headings). You will find footnote references for metrics where we have shared additional details or where changes to previous shared metrics have been identified. 2012-2018 key metrics are available in the [Comerica 2018 Corporate Responsibility Report \(Pages 90-96\)](#);
2. Our Reporting Methodology, which explains the reporting standards and guidance used and references other reporting information;
3. The Global Reporting Initiative (GRI) Standards Content Index, which highlights how our report connects to and meets the Global Reporting Initiative Standards framework for sustainability reporting; and
4. The Sustainability Accounting Standards Board (SASB) Content Index, which references SASB indicators that we have addressed within our CR Report.

OUR COMPANY	2019	2020
Gross revenue (Millions \$) ¹	3,349	2,912
Market capitalization at year end (Millions \$) ²	10,195	7,774
Common and preferred stock dividends (Millions \$)	398	391
Taxes (Millions \$)	336	220
Employee compensation and benefits (Millions \$)	1,020	1,019
Goods and services purchased (Millions \$)	709	751
Total loans at year end (Millions \$)	50,369	52,291
Renewable Energy Tax Credit Investments (Millions \$)	—	21

¹ Gross revenue is comprised of net interest income and noninterest income.

² Source: S&P Global Market Intelligence.

CUSTOMERS	2019	2020
New small business loan commitments (Millions \$)	>1,000	810
SBA lending, including 7a and 504 loans (Millions \$)	128	123
Privacy & Protection		
Number of substantiated complaints received concerning breaches of customer privacy- complaints received from outside parties and substantiated by the organization ³	2	1
Total number of identified leaks, thefts or losses of customer data	55	52
Innovation & Technology		
Real Time Payments average monthly volume (% Change) ⁴	—	252
ACH average monthly volume (% Change) ⁴	—	9
Wire transfers average monthly volume (% Change) ⁴	—	17
Number of Mobile Banking Users (% Change) ⁴	—	14
Click & Capture Mobile Deposits (% Change) ⁴	—	39
Zelle transactions (% Change) ⁴	—	96
Web Bill payment sent electronically (% Change) ⁴	—	1
Checking statements sent electronically / month (% Change) ⁴	—	7
Banker Connect (video teller) machines deployed (Total number of)	54	93
PPP loans closed accomplished by leveraging technology (Number of)	—	14,735
ESG-Related Lending & Investment		
See Environmentally Beneficial Lending Metrics		
See Community and Economic Development Loans and Tax Credit Investment Metrics		
See Total in New Account Openings from Business Resource Group (BRG) Business Referrals Metric		

³ For 2020, the one substantiated complaint was also included in the total number of identified leaks, thefts or losses of customer data number.

⁴ Revised year-end 2020 innovation and technology metrics (updated on 8/31/21)

RESPONSIBLE BUSINESS	2019	2020
Anti-Corruption, Ethics and Countering Bribery		
Number of internal incidents of alleged corrupt behavior investigated	241	277
Number of cases where allegations were substantiated and/or employee admitted involvement	103	86
Number of legal rulings against Comerica or its employees for corruption	0	0
Colleague Annual Compliance Training (percent relevant employees who completed the required course)		
Anti-Money Laundering	99.6	99.9
Comerica Code of Business Conduct and Ethics for Employees	99.9	99.9
Fair Lending Anti-Discrimination	99.8	99.8
Information Privacy and Protection	99.9	99.9
Community Reinvestment Act	99.8	99.8
Financial Abuse of Elderly and Vulnerable Adults	99.9	99.9
Workplace Harassment	99.8	99.9
Information Lifecycle Management	99.9	99.9
Diversity	99.9	100.0
Sustainability	100.0	100.0
Public Policy & Government Relations		
Comerica PAC contributions to political candidates and committees (Thousands \$) ⁵	135	376

⁵ Comerica PAC contributions (Nov 1 previous year-Oct 31 reporting year)

COLLEAGUES		2019	2020
Talent Attraction- Employee Demographics			
Total Employees	Full-time equivalents (FTE) ⁶	7,747	7,681
	Total number of employees ⁷	7,948	7,870
	Full-time	7,467	7,429
	% Female	64	64
	% Male	36	36
	Part-time	481	441
	% Female	85	83
	% Male	15	17
Employee Breakdown by Generations	% Traditionalist (Born prior to 1946)	<0.1	0
	% Baby Boomer (1946-1964)	31	26
	% Gen X (1965-1980)	36	39
	% Millennial (1981-2000)	33	35
	% Generation Z (After 2000)	<0.1	<1
Employee Breakdown by Length of Service	% 0-5 Years	45	45
	% 6-15 Years	23	24
	% 16-25 Years	17	17
	% 26+ Years	15	15

⁶ As reported in Comerica's 2020 10-K (page F-116).

⁷ As reported in Comerica's 2020 10-K (page 11).

COLLEAGUES			2019	2020
Talent Attraction- Employee Demographics				
Employee Breakdown by Age	Full-time	% <30 years	—	12
		% 30-50 years	—	48
		% >50 years	—	40
	Part-time	% <30 years	—	0
		% 30-50 years	—	53
		% >50 years	—	47
	Officials and Managers	% <30 years	—	16
		% 30-50 years	—	45
		% >50 years	—	39
	Professionals	% <30 years	—	12
		% 30-50 years	—	48
		% >50 years	—	40
New Hires By Gender	Female	Number of new hires	740	524
		% of Total	58	61
	Male	Number of new hires	525	337
		% of Total	42	39

COLLEAGUES			2019	2020
Talent Attraction- Employee Demographics				
New Hires By Age	Under 30 Years Old	Number of new hires	565	389
		% of Total	45	45
	30-50 Years Old	Number of new hires	535	347
		% of Total	42	40
	Over 50 Years Old	Number of new hires	165	125
		% of Total	13	15
New Hires By Market	California	Number of new hires	271	181
		% of Total	21	21
	Florida	Number of new hires	17	7
		% of Total	1	1
	Michigan	Number of new hires	659	445
		% of Total	52	52
	Texas/Arizona	Number of new hires	317	227
		% of Total	25	26
	Other	Number of new hires	1	1
		% of Total	<1	<1
Talent Development				
Average hours of training per employee (mandatory and non-mandatory)			35	24
Percentage of colleagues who took advantage of non-mandatory, non-compliance skills training			74	96
Number of skills-based courses offered to Comerica colleagues			9,346	>6,900
Leadership Development Program (number of graduates) ⁸			—	—
Emerging Leaders Program (number of graduates) ⁸			44	—

⁸ Comerica's Leadership Development Program and Emerging Leaders Program are offered on a bi-annual basis in alternating years. In 2020, Comerica's Leadership Development Program was anticipated to take place but was placed on hold due to the coronavirus pandemic.

COLLEAGUES			2019	2020
Talent Retention				
Services provided through Comerica's Employee Assistance Program (# of instances)			3,054	2,892
Employees receiving tuition assistance (total number)			124	99
Value of tuition assistance received (\$)			444,332	418,361
Employee Awards (number of monetary awards to employees)			3,527	3,710
Value of Employee Awards (\$)			522,580	578,123
Employee Turnover Total	Number of		1,334	938
	Percent of Total Employees		16.8	11.6
Employee Turnover By Gender	Female	Number of	859	600
		% of Total	64	64
	Male	Number of	475	338
		% of Total	36	36
Employee Turnover By Age	Under 30 Years Old	Number of	368	292
		% of Total	28	31
	30-50 Years Old	Number of	581	347
		% of Total	44	37
	Over 50 Years Old	Number of	385	299
		% of Total	29	32

COLLEAGUES			2019	2020
Talent Retention (Continued)				
Employee Turnover By Type and Market	Voluntary	Number of	974	771
		% of Total	73	82
		California %	25	20
		Florida %	1	2
		Michigan %	47	55
		Texas/Arizona %	27	22
	Involuntary	Number of	360	167
		% of Total	27	18
		California %	9	19
		Florida %	1	0
		Michigan %	60	63
		Texas/Arizona %	30	17

COLLEAGUES	2019	2020
Employee Engagement		
Number of Diversity-Related Employee Resource Network Group (ERNG) categories	7	10
Number of Diversity-Related ERNG chapters within our markets	13	18
Number of Local Diversity Awareness Roundtable Teams	5	6
Number of Green Office Teams	9	9
Number of employees participating in Financial Education Brigade	183	753
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program (Percent) ⁹⁹	84	86
Bronze-level certified colleagues (number of)	4,807	4,823
Silver-level certified colleagues (number of)	3,905	4,016
Gold-level certified colleagues (number of)	3,190	3,318
Platinum-level certified colleagues (number of)	1,928	2,012
Colleagues enrolled in Comerica's Master of Sustainability Awareness (MSA) Program (Number of) ⁹	482	515
Seedling-level certified colleagues (number of)	69	77
Sapling-level certified colleagues (number of)	13	14
Mighty Oak-level certified colleagues (number of)	5	4

⁹ MDA/MSA level listings are cumulative. If a colleague has been certified at the highest level, employee is also counted in the lower certification levels.

DIVERSITY, EQUITY & INCLUSION	2019	2020
Diversity, Equity & Inclusion- Internal		
Women employees (Percent of total employees)	65	65
Women Officials and Managers (total number) ¹⁰	684	688
Women Professionals (total number) ¹⁰	1,517	1,545
Women Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰	2,954	2,844
Racial/Ethnic Minority Population employees (Percent of total employees)	40	41
Racial/Ethnic Minority Officials and Managers (total number) ¹⁰	356	375
Racial/Ethnic Minority Professionals (total number) ¹⁰	932	947
Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰	1,882	1,867
For more employee diversity metrics, please refer to the Key Metrics - Talent Attraction .		
Diversity, Equity & Inclusion- External		
Reaching Diverse Customers		
Number of Comerica Business Resource Groups (BRG) teams	19	19
Total in new account openings from BRG business referrals (Millions \$)	>160	383
Supplier Diversity		
Total Diverse Supplier Spend (Millions \$) ¹¹	52	42
Total Diverse Supplier Spend Goal (Millions \$)	47	45
Tier 1 Diverse Supplier Spend (Million \$)	35	33
Tier 2 Diverse Supplier Spend (Million \$)	17	9

¹⁰ EEO-1 categories used for breakdown of Women and Racial/Ethnic Minority employee numbers. Additional Diversity, Equity & Inclusion metrics are included within Comerica's [Most Recent Diversity, Equity & Inclusion Progress Report](#).

¹¹ Total Diverse Supplier Spend includes Tier 1 and Tier 2 spending

DIVERSITY & INCLUSION	2019	2020
Diversity, Equity & Inclusion- External (Continued)		
Supplier Diversity		
Percent of RFPs tracked which included diverse suppliers ¹²	56	89
Percent of contracts awarded to diverse suppliers for relevant RFPs ¹³	34	35
Board Diversity		
Number of Board Directors	11	11
% Independent Directors	91	91
% Racial/Ethnic Minority Directors ¹⁴	27	27
% Female Directors ¹⁴	27	27
% Directors <30 years age	—	0
% Directors 30-50 years age	—	9
% Directors >50 years age	—	91

¹² Our process to collect diverse supplier sourcing project data moved from a manual process to an automated process, which now consolidates data from our online supplier sourcing platform. As such, the process of data collection in 2020 is considered to be more accurate than the manual data collection process in 2019 and the two years of data may not be truly comparable.

¹³ Percentage of projects that included diverse suppliers that were sourced to diverse suppliers

¹⁴ In 2020, a racial/ethnic minority Director held a key Board leadership position (Enterprise Risk Committee chair) and female Directors held key Board leadership positions (Independent Facilitating Director and Governance, Compensation and Nominating Committee chair)

ENVIRONMENT	2012	2019	2020
Energy			
Employee Numbers for Intensity Metrics			
Annual Report-based employee FTEs - used for travel intensity-based metrics ¹⁵	9,035	7,747	7,681
Human Resources-based employee FTEs - used for real estate intensity-based metrics ¹⁵	—	7,600	7,536
Total Workers (including employees and contingent workers within our buildings, on FTE basis)- used for real estate intensity-based metrics ¹⁵	—	8,422	8,210
Energy Use (MWh)			
Total direct and indirect energy use- real estate and transport (MWh)	153,210	105,699	95,286
Total direct and indirect energy use- real estate and transport (Billion Joules)	551,556	380,407	343,029
Total direct and indirect energy use- real estate only (MWh) ¹⁶	148,266	102,438	93,662
Direct energy use- fossil fuels (MWh)	30,966	27,646	24,378
Indirect energy use- purchased electricity, steam, chilled water in metered buildings (MWh)	93,779	56,960	53,689
Indirect energy use- estimated electricity use in leased (and unmetered) buildings (MWh)	28,465	13,623	12,048
Energy Intensity			
Total direct and indirect energy use- real estate (MWh) per square foot at year end	0.0267	0.0253	0.0218
Total direct and indirect energy use- real estate (MWh) per square foot - average square feet over four quarters	—	0.0234	0.0216
Total direct and indirect energy use (MWh) per full time employee (FTE)	—	13.90	12.64

¹⁵ Our Human Resources (HR)-generated FTE number uses a slightly different calculation than the Annual Report FTE number and allows us to break down workers by individual locations. This allows for intensity metrics to be generated at the facility level. We use the HR-based FTE number for our real estate-related intensity-based metrics and Annual Report employee FTE for the travel-intensity metrics (from 2020 Annual Report, Page F-116).

¹⁶ Total direct and indirect energy use- real estate only includes Natural Gas, Diesel Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and/or Chilled Water.

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions			
Total GHG Emissions from Scopes 1 & 2 Real Estate and Scope 1 Travel (Metric tons of CO ₂ e)	81,735	42,621	38,354
GHG emissions- Scopes 1 and 2 Real Estate only- (Metric tons of CO ₂ e)	80,533	41,828	37,954
Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end) within organization	0.0145	0.0096	0.0088
Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters) within organization	—	0.0096	0.0088
Percent Cumulative Scope 1 & 2 Real Estate GHG reduction from 2012 base year (Goal= 20 percent GHG reduction from base year by 2020)	—	48	53
GHG emissions- Scope 1 transport only	1,201	793	400
Breakdown by Scope¹⁷			
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	6,304	5,401
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings	74,784	36,316	32,953
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport			
Purchased Goods and Services			
Total lifecycle paper emissions ¹⁸	3,055	4,560	4,758
Life cycle emissions-office copy paper use ¹⁸	1,270	1,662	957
Life cycle emissions-other office paper use ¹⁸	1,563	2,721	3,643
Life cycle emissions-marketing paper use ¹⁸	222	176	159
Total lifecycle computer emissions	520	2,816	1,265
Total lifecycle carpeting emissions	137	504	157

¹⁷ Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its greenhouse gas (GHG) emissions. Specific methodologies for estimating Scope 1, Scope 2, and Scope 3 emissions, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in [Comerica's CDP Climate Change Response](#).

¹⁸ Paper Emissions in 2019-2020 were calculated using Environmental Paper Network Paper Calculator Version 4.0. 2012 Paper Emissions were calculated using Environmental Paper Network Paper Calculator Version 3.2.

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions (Continued)			
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport (Continued)			
Capital Goods			
Total lifecycle furniture emissions	—	989	832
Fuel-and-energy related activities			
Electricity transmission/distribution loss emissions	—	1,708	1,657
Upstream Transportation and Distribution			
Shipping emissions ¹⁹	—	195	—
Armored vehicle emissions	—	69	463
Waste Generated in Operations			
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	505	412
Business Travel			
Employee business travel by air and car	4,431	3,515	1,108
Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE)	—	0.46	0.14
Employee Commuting			
Employee commuting emissions	—	25,837	12,918

¹⁹ We have been informed by our shipping supplier that their emissions reporting platform, which we have used to estimate Comerica's previous years' shipping-related GHG emissions, is not available for estimating 2020 shipping-related emissions.

ENVIRONMENT	2012	2019	2020
Climate Change and Greenhouse Gas (GHG) Emissions (Continued)			
Downstream Leased Assets			
Total Downstream Leased Assets	1,257	629	419
Subleased metered electricity	726	397	271
Subleased estimated electricity	423	12	10
Subleased natural gas	81	71	65
Subleased steam	28	0	0
Subleased estimated heat-natural gas	—	0	5
Subleased corporate jet emissions	—	149	68
Other Downstream			
CBRE Business Travel on Comerica Account	—	171	241
Comerica Leased Fleet ²⁰	—	—	84
Real Estate Square Footage (Square feet at year end)			
Total metered and unmetered square feet at year end	5,545,466	4,350,468	4,305,584
Total subleased square feet at year end	137,637	63,375	62,725
Real Estate Square Footage (Average square feet over four quarters)			
Average metered and unmetered square feet over four quarters	—	4,370,816	4,332,328
Average subleased square feet over four quarters	—	66,099	63,178

²⁰ In early 2020, we transferred much of our corporate fleet vehicles from Scope 1 to Scope 3 as we no longer own the vehicles (our security vendor now owns and manages the vehicles).

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

ENVIRONMENT	2012	2019	2020
Environmental Attributes of Paper			
Total FSC-certified office paper (Percent of total)	47	43	24
Total FSC-certified marketing paper (Percent of total)	64	100	100
Office copy paper \geq 30 percent post-consumer recycled content (Percent of total office copy paper)	97	96	95
All other papers (excluding office copy paper) \geq 10 percent post-consumer recycled content (Percent of total papers except office copy paper)	14	9	26
Total post-consumer recycled content by weight (Percent of total paper consumption)	14	13	7
Water Stewardship			
Total water consumption (cubic meters) ²¹	451,532	301,369	298,125
Intensity metric- Water consumption (cubic meters per Total Employee FTE)	—	39.65	39.56
Intensity metric- Water consumption (cubic meters per Total Worker FTE)	—	35.78	36.31
Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020)	—	33.3	34.0
Environmentally-Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)			
Loan commitments (Billions \$)	1.0	0.9	1.2
Loan commitments (number of companies)	127	82	120

²¹ 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.

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

²² Inclusive of Shaw purchases, representing 95% of all 2020 flooring purchases.

²³ EPEAT certified computers/displays for 2020 (39.4% silver and 60.3% gold)

²⁴ 2020 data not directly comparable to 2019 as purchase and BIFMA certification data was not available from all 2020 furniture vendors.

COMMUNITY	2019	2020
Financial Inclusion & Financial Education		
Number of ATMs	577	584
Number of U.S. banking centers	435	432
Comerica Secured Credit Cards (Number of) for low- and moderate-income customers ²⁵	770	823
Number of Access Checking Customers (low- and moderate-income) ^{25/26}	8,819	6,822
Access Checking Balances (Millions \$) (low- and moderate-income customers) ^{25/26}	28	23
Number of low- and moderate-income individuals reached through Comerica-sponsored financial education events with nonprofit partners	35,766	35,765
Community Investment & Development		
Community and economic development loans (Millions \$)	327	1,233
Low-income housing tax credit investment deals (Millions \$)	81	75
New market tax credit investment deals (Millions \$)	—	10
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent)	4	5
Number of micro-enterprise loan funds supported	28	28

²⁵ Tailored retail banking products within our CRA Assessment areas in Arizona, California, Florida, Michigan and Texas

²⁶ Access Checking account has no monthly fee with direct deposit.

COMMUNITY (Continued)	2019	2020
Volunteerism & Philanthropy		
Charitable gifts and corporate contributions (Millions \$)	8.4	13.2
Employee United Way contributions (Millions \$)	1.7	1.6
Employee time volunteered (hours)	71,376	39,368
Corporate-wide employee volunteer goal (hours) ²⁷	64,000	64,000
Number of employee volunteers	2,490	1,892
Approximate worth of employee volunteer time (Millions \$)	1.8	1.0

²⁷ Annual corporate-wide employee volunteer goal is equivalent to approximately eight hours per employee

Comerica's 2020 Corporate Responsibility Report represents our latest ESG-based report on the impacts and opportunities associated with our work in the communities we serve. We recognize the interconnected nature of Corporate Responsibility as it relates to providing the right products and services to meet evolving customer demands and regulatory requirements, while being mindful of minimizing our environmental footprint and maximizing our positive community impacts.

We use the internationally-recognized GRI Sustainability Reporting Standards to guide our reporting and track our progress. This report has been prepared in accordance with the GRI Standards: Core option and includes the General Disclosures as well as Topic-Specific Disclosures relevant to Comerica. This report is Comerica's eighth GRI-based Corporate Responsibility (formerly Sustainability) Report. It covers our sustainability performance from January 1, 2020, to December 31, 2020 (fiscal year 2020). In some instances, 2019 or previous data is included for comparison and in some limited instances, the report also references some projects and initiatives that stretched beyond 2020 and into 2021.

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2020 Comerica Incorporated Annual Report](#) (herein referred to as 2020 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2020. References to the "Board" refer to the Board of Directors of Comerica Incorporated.

Impact Topics referenced are those economic, environmental, social and governance topics viewed by internal and external stakeholders as the most relevant and significant to our business based on extensive engagement. This is explained in detail in [Stakeholder Engagement and ESG Impact Assessment Report](#). We have also mapped our Impact Topic groupings to the United Nations 17 Sustainable Development Goals (SDGs) as illustrated on the [Our Report and the Sustainable Development Goals](#) page of this report. Note the impact topic "Financial Inclusion & Financial Literacy" was renamed after publishing of our June 2020 Update to the ESG Impact Assessment Report and is referred to in this report as "Financial Inclusion & Financial Education."

In addition to GRI, Comerica also acknowledges other sustainability reporting guidelines, including those outlined by the Sustainability Accounting Standards Board (SASB) Financials sector standards. While not specifically designed to meet other reporting frameworks, the information presented in this report may address some of the requested disclosures for the SASB Financials sector standards most relevant to our business. Our [SASB Content Index](#) is provided at the end of the Additional Information section.

To learn more about sustainability and corporate responsibility at Comerica, or to provide feedback on our reporting, please contact Scott Beckerman, Director of Corporate Sustainability, at jsbeckerman@comerica.com or visit us at Comerica.com/sustainability.

Please note: In this report, we use the terms “relevancy”, “significance”, and “impact” to refer to those topics that reflect the economic, environmental, social, and governance issues most important to Comerica and our stakeholders — what the GRI Sustainability Reporting Standards define as “Material Topics.” This is to avoid potential confusion with the terms “material” or “materiality” as defined by or construed in accordance with securities laws or other U.S. legislation, or as used in the context of financial statements and financial reporting. In this Index, our use of the terms “material” and “non-material” only refer to the meanings as referenced in defining report content in the context of GRI’s reporting standards.

This report is intended to meet “Core” requirements of GRI Standards. In some instances, we have also included non-core GRI General Disclosures in this Content Index where we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents. We have also incorporated information on some topics within the Topic-Specific Disclosures, which we have determined to be “non-material” since that information may be of interest to our stakeholders. Those topic-specific disclosures which are not indicated as material and for which we do not provide significant content in this report have been omitted from this table.

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

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 102: Organizational Profile (Continued)		
Ethics and integrity		
102-16	Values, principles, standards, and norms of behavior	<p>Our Company, Reputation, Diversity, Equity & Inclusion, 2020 Annual Report, Corporate Governance, 2021 Proxy Statement, Reputation, Diversity Commitment, Codes of Ethics</p> <p>Corporate Governance Guidelines, Codes of Ethics</p> <p>Our Code of Business Conduct and Ethics for Employees is a key tool for instilling an ethical culture at Comerica and ensuring our compliance with related laws and regulations. The Code supports the Comerica Promise and provides guidance on issues including ethical business practices, fair dealing, maintaining professional relationships, avoiding conflicts of interest, and reporting illegal or unethical behavior.</p>
102-17	Mechanisms for advice and concerns about ethics	<p>The honesty, integrity and sound judgment of the CEO and senior financial officers is fundamental to our reputation and success. Accordingly, we also have a Senior Financial Officer Code of Ethics. Additionally, to assist in fostering a culture of openness and accountability, Comerica Board members are subject to our Code of Business Conduct and Ethics for Members of the Board of Directors.</p> <p>We use a variety of communication channels, including training and our intranet site, to remind colleagues of the importance of reporting conduct that may violate the law or our Code of Business Conduct and Ethics for Employees. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees.</p>
Governance		
102-18	Governance structure	<p>Responsible Business, Corporate Governance, Corporate Governance Guidelines, 2021 Proxy Statement, 2020 Annual Report</p> <p>Responsible Business, Colleagues, Corporate Governance Guidelines</p>
102-19	Delegating authority	<p>Comerica launched an Environmental, Social and Governance (ESG) Council in 2020, comprised of senior leaders working on ESG topics across the bank. This group has set a strategy to further advance Comerica's efforts on ESG topics of importance to Comerica and our stakeholders and reports progress to Comerica's Executive Team, including Comerica's CEO, on a semi-annual basis. The Enterprise Risk Committee of the Board of Directors has responsibility for ESG issues to the extent they present significant risk to the organization. The overall Board of Directors is also informed of significant ESG issues, when appropriate.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>2021 Proxy Statement, Corporate Governance Guidelines, 2021 CDP Response, Most Recent Diversity, Equity & Inclusion Progress Report, Leadership Message</p>
102-21	Consulting stakeholders on economic, environmental, and social topics	<p>ESG Impact Assessment</p>
102-22	Composition of the highest governance body and its committees	<p>Responsible Business, 2021 Proxy Statement, Corporate Governance Guidelines</p>

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

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 201 Economic Performance 2016		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic. 2020 Annual Report
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic, Business Risk Management , 2020 Annual Report
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic, Business Risk Management , 2020 Annual Report
201-2	Financial implications and other risks and opportunities due to climate change	Climate Change Impacts , 2021 CDP Response , Key Metrics (Climate Change and GHG Emissions)
GRI 203 Indirect Economic Impacts 2016		
103-1	Explanation of the material topic and its Boundary	Our Comerica GRI Impact Topics, ESG Lending & Investment, Financial Inclusion & Financial Literacy, Community Investment & Development, Volunteerism & Philanthropy and Diversity, Equity & Inclusion align with the GRI 203 Indirect Economic Impact disclosure. ESG Impact Assessment , ESG-Related Lending & Investment , Environmentally Beneficial Lending , Financial Inclusion and Financial Education , Community Investment & Development , Volunteerism & Philanthropy , Diversity, Equity & Inclusion
103-2	The management approach and its components	<i>Environmentally Beneficial Lending:</i> Since 2012, Comerica has tracked environmentally beneficial or green loans within our loan systems. We do this using a list of 14 green loan categories to code loans and commitments to green companies and projects. We include both inherently green companies and projects, as well as loans where the majority of the funding is being used to achieve an environmentally beneficial purpose. We have intentionally set a high bar with respect to green loan coding to ensure we are not "greenwashing" or overstating results in this area. We provide resources and guidance to help colleagues accurately code environmentally beneficial loans in Comerica's systems. On a quarterly basis, we share the environmentally beneficial loan data by dollar amount and customer count with Comerica's Sustainability Council. Comerica's Sustainability Office also continues to work with our lending and credit groups to discuss opportunities to provide loans to environmentally beneficial sectors in ways that also meet Comerica's credit requirements. <i>Business Resource Groups (BRGs):</i> Our Chief Community Officer has leadership oversight of Comerica's BRG teams, which operate across our primary markets to pursue strategies that meet the banking needs of our diverse communities. Each team is made of individuals who come from diverse backgrounds and from different positions within Comerica. Structurally, the team is assigned an executive sponsor who is a member of the bank's leadership to lead the team's focus. An outreach budget is provided to support business development and community outreach with relevant associations and nonprofit partners serving underserved communities. For example, each team has a goal of conducting financial education opportunities supporting the bank's efforts to raise expectations in the communities we serve. Comerica's BRG teams impacted over \$300 million in new account openings in 2020.

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 203 Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	<p>Key Metrics (Community), Financial Inclusion & Financial Education, Community Investment & Development, Volunteerism & Philanthropy, Comerica Charitable Giving, Comerica Works®, CRA</p> <p><i>Investing in Neighborhood Revitalization and Small Business:</i> Comerica serves the needs of the communities in which we operate. A good example of this is our investments in tax credit-financed real estate. Through this activity, Comerica provides a vital component of financing to community development projects, which address specific needs in low income communities by creating quality housing, nearby employment opportunities and social/educational services. All of our tax credit investments must be qualified for CRA credit. Furthermore, our tax credit investing enables us to direct financial resources to the communities where we have the strongest connections and in ways that have the greatest social impact. Our investments help create housing developments with targeted tenancy such as people at the lowest income ranges, residents with special needs, military service veterans and senior members in our markets.</p> <p>Additionally, some investment activity is used to preserve affordability in locations experiencing increases in rental rates. Further investment activity stimulates business investment in distressed communities. Our commercial and philanthropic investment actions help achieve positive social impacts for communities that goes beyond typical financing activities. Comerica's investments in qualified tax credit developments help create stable communities and support families with high-quality affordable housing alternatives.</p> <p><i>Community Reinvestment Act:</i> In January 2020, Comerica named Irvin Ashford, Jr. its Chief Community Officer, with responsibility for community reinvestment nationally and all associated activities, including development, lending, community investments, volunteerism and data analysis. Comerica is dedicated to seeking advice and counsel from its Community Development Advisory Councils (CDACs) and informing its CDACs regarding pertinent CRA and business strategies. There is one national council and three regional councils representing the community interests of their respective markets. A CDAC membership roster can be found on comerica.com/CDAC.</p> <p>The Community Reinvestment Act (CRA) of 1977 is a regulation that encourages financial institutions to address the needs of their entire communities, including those in low- and moderate-income (LMI) areas. We have a dedicated team of seven External Affairs market managers who are responsible for working with our community partners to support the needs of the markets where we operate. These market managers also identify opportunities where Comerica can support community projects and provide targeted products and services. We also have a CRA Compliance team that works closely with External Affairs to measure and consistently improve performance. A CRA Working Group of senior leaders ensures that established goals and benchmarks are met. For more details on Comerica's CRA progress, please review our Community Reinvestment Act page on Comerica.com.</p>
		<p>Financial Inclusion & Financial Education, Community Investment & Development, Volunteerism & Philanthropy, Comerica Charitable Giving, Comerica Works®, Community Reinvestment Act page on Comerica.com, Key Metrics (Community), See 203-1 above.</p>
203-2	Significant indirect economic impacts	

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 204 Procurement Practices 2016		
103-1	Explanation of the material topic and its Boundary	<p>This is not a Comerica GRI Impact Topic. Supplier Diversity Program</p> <p>In 2020, Comerica had over 3,000 active suppliers and an annual supplier spend of approximately \$700 million dollars, 67% of which is with our top 100 active suppliers. 51% of our supply base (by number of suppliers) and 29% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,029 suppliers in Michigan and 562 suppliers in Texas.</p>
103-2	The management approach and its components	<p>This is not a Comerica GRI Impact Topic, Supplier Diversity Program, 2021 CDP Response (question 12.1a), Key Metrics (Diversity, Equity & Inclusion), Key Metrics (Supplier Sustainability Engagement)</p>
103-3	Evaluation of the management approach	<p>This is not a Comerica GRI Impact Topic, Supplier Diversity Program, 2021 CDP Response (question 12.1a), Key Metrics (Diversity, Equity & Inclusion), Key Metrics (Supplier Sustainability Engagement)</p>
204-1	Proportion of spending on local suppliers	<p>51% of our supply base (by number of suppliers) and 29% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,029 suppliers in Michigan and 562 suppliers in Texas.</p>
GRI 205 Anti-corruption 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topics, Anti-Corruption, Ethics and Countering Bribery and Business Risk Management, align with GRI 2015 Anti-corruption.</p> <p>ESG Impact Assessment, Anti-Corruption, Ethics and Countering Bribery</p> <p>Anti-Corruption, Ethics & Countering Bribery, Business Risk Management, 2020 Annual Report, Corporate Governance</p>
103-2	The management approach and its components	<p><i>Codes of Ethics:</i></p> <p>Our Code of Business Conduct and Ethics for Employees is a key tool for instilling an ethical culture at Comerica and ensuring our compliance with related laws and regulations. The Code supports the Comerica Promise and provides guidance on issues including ethical business practices, fair dealing, maintaining professional relationships, avoiding conflicts of interest, and reporting illegal or unethical behavior.</p> <p>The honesty, integrity and sound judgment of the CEO and senior financial officers is fundamental to our reputation and success. Accordingly, we also have a Senior Financial Officer Code of Ethics. Additionally, to assist in fostering a culture of openness and accountability, Comerica Board members are subject to our Code of Business Conduct and Ethics for Members of the Board of Directors.</p> <p>We use a variety of communication channels, including training and our intranet site, to remind colleagues of the importance of reporting conduct that may violate the law or our Code of Business Conduct and Ethics for Employees. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 200: Economic Standard Series		
GRI 205 Anti-corruption 2016		
103-2	The management approach and its components (continued)	<p><i>Countering Corruption:</i> Money laundering, bribery and corruption also pose significant potential risks to Comerica, such as damaging our business and reputation or provoking regulatory scrutiny. Countering the potential for such activity is a high priority. Certain lines of business and product offerings inherently carry more risk of corruption. As such, Comerica's Bank Secrecy Act/Anti-Money Laundering risk assessment considers risk factors, such as customer geography and demographic information, as well as mode of interacting with customers (i.e., in-person or online).</p> <p>Our rigorous Anti-Money Laundering (AML) Compliance program deploys systems to monitor customer and business unit risks and implements additional controls and/or quality assurance reviews when specific risks are identified. Our Anti-Corruption and AML policies are periodically reviewed and updated to ensure they are commensurate with any changes to our risk appetite. Anti-corruption and AML policies are approved by our Board of Directors and are independently tested on a yearly basis by Internal Audit and outside regulatory agencies. We continue to manage regulatory expectations and follow proposed legislation.</p> <p>Fulfilling the Comerica Promise includes presenting our products to consumers honestly. We review our marketing communications before release to ensure compliance with relevant regulations and laws, including the Equal Credit Opportunity Act; the Truth in Lending Act; the Truth in Savings Act; and Unfair, Deceptive and Abusive Acts and Practices. The Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC) also regulate certain types of marketing materials and we carefully review such material through our legal, risk and compliance processes. Comerica monitors compliance with marketing laws and regulations through regulatory agency examination performance, internal audits and internal testing. Our Quality Process Department also reviews relevant customer complaints to identify potential issues.</p>
103-3	Evaluation of the management approach	<p>Key Metrics (Responsible Business), Business Risk Management, 2020 Annual Report, Corporate Governance</p> <p>Our approach to anti-corruption, ethics & countering bribery is reviewed on an ongoing basis and adjustments to our policies and procedures are made when appropriate. We have an internal Problem Resolution Procedure designed to ensure that employees have the opportunity to formally address their concerns and present alternative solutions regarding their conditions of employment. In 2020, 45 complaints were recorded via the Human Resources hotline, all of which were resolved. There were no labor practice grievances filed through formal grievance mechanisms in 2020.</p> <p>Per U.S. regulatory requirements for customer contacts and interactions, we implement internal policies and procedures, including clearly stated interest rates and other terms and conditions. We require that relevant colleagues complete comprehensive, annual fair lending and anti-discrimination training, with 99.8% of applicable employees doing so in 2020. Our training is updated as warranted to cover additional emerging issues related to anti-corruption.</p> <p>We are not aware of any incidents of non-compliance related to fair lending, anti-discriminatory regulations, anti-competitive behavior or anti-trust or monopoly practices occurring in 2020 that would have a material adverse effect on our operations or ability to perform the services we offer.</p>
205-1	Operations assessed for risks related to corruption	<p>Comerica's Risk and Control Self-Assessment process documents Operational Risks. This risk assessment is conducted by business units and updated annually. Significant Operational Risks are identified in Comerica's 2020 10-K (Item 1A-Risk Factors).</p>

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

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 302 Energy 2016		
		Energy & Emissions , Environmental Policy Statement , 2021 CDP Response
103-2	The management approach and its components	<p>Approach to Environmental Sustainability: Environmental sustainability is embedded into our corporate culture and day-to-day operations. We manage underlying and arising issues relating to environmental sustainability in our operations and supply chain through a variety of structures, including our Corporate Sustainability Office, cross-functional teams, operations-related departments and our Sustainability Council, encompassing senior-level staff from across the bank who set Comerica's sustainability strategy and goals. The Enterprise Risk Committee of the Board of Directors reviews and approves our sustainability strategy on an annual basis. The Sustainability Office develops and executes an annual action plan that is approved by the Sustainability Council to ensure we continue making significant progress on our environmental sustainability goals.</p> <p>Our operational environmental impacts include GHG emissions, energy, fuel and water use, and waste generation, as well as the procurement of the goods and services needed to operate our business. Our Corporate Sustainability Office evaluates and manages the risks and opportunities associated with our environmental-related Impact Topics (Energy & Emissions and Environmental Resource Management) as well as for Water Stewardship. This is done in collaboration with the business units responsible for the relevant operations. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight.</p> <p>Approach to Energy and Emissions: To actively reduce climate change risks associated with our operations, we focus our efforts on two key areas: reducing energy use and reducing GHG emissions. In addition to multiple environmental benefits, there are also business benefits including creating a more desirable workplace, improving colleague retention and attraction, customer appeal and company profitability. Reducing energy consumption is key to minimizing our GHG emissions footprint since the majority of our direct GHG emissions are related to energy used to operate our buildings. For more details on Comerica's 2020 energy consumption, GHG emissions (Scope 1-3) and reduction initiatives, refer to our 2021 CDP Response.</p>
		Energy & Emissions
103-3	Evaluation of the management approach	<p><i>Evaluation of Environmental Sustainability:</i> Each quarter, a detailed report is produced to track progress across our environmental Key Performance Indicators (KPIs). This KPI report tracks utility-related water, energy usage and emissions along with data for other reported sustainability-related activities, such as corporate travel, waste creation and paper use. We analyze the results and trends from these reports and share them with key decision makers, such as our Corporate Real Estate leadership, the Corporate Sustainability Office and the Sustainability Council, which includes the Chief Financial Officer, the executive sponsor of Comerica's Corporate Sustainability Program. We also relay relevant information and metrics to our Facilities Management and Engineering teams to keep them informed of our facilities' performances which allows them to take action, as appropriate, to help ensure we meet our environmental goals.</p>

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 300 Environmental Standards Series		
GRI 303: Water and Effluents		
103-2	The management approach and its components (continued)	<p>We track our water consumption at locations where we are responsible for our water utility bills (our metered sites) by evaluating water bills for any anomalies in consumption or spend, which may indicate leaks or theft. This consumption data is then added to our energy management system, which we use to evaluate data trends quarterly. The trend data helps us understand weather-related impacts on our water consumption, impacts associated with water efficiency measures and impacts resulting from property leaks.</p> <p>As a company, Comerica's water usage is split between domestic (interior) water use and landscape irrigation activities, although facilities with irrigation systems in place use a much larger proportion of their water for that purpose. To assist in using water more efficiently, Comerica has incorporated irrigation controls systems at selected sites in Texas, Arizona, California and Michigan. These controls adjust irrigation schedules and timing based on local weather, soil permeability and plant type. We continue to evaluate our properties for the potential for smart irrigation technology or conversion to low-water or drought-tolerant landscaping, and have added language to our regional landscaping contracts to further promote regular inspections of irrigation systems and site-tailored watering schedules based on plant needs, soil type and topography. Our Facilities Management team has also been trained on how to monitor for water leak or water waste situations at their managed facilities.</p> <p>Even though the pandemic dramatically affected occupancy rates within Comerica's office buildings, in 2020, our water usage only slightly decreased (down 1.1%). The primary driver of the decrease was reduced domestic water use due to lower occupancy in large buildings. Irrigation schedules were tightened, but landscaping still required water throughout 2020.</p>
103-3	Evaluation of the management approach	Refer to Evaluation of Environmental Sustainability information shared 302 Energy 103-3 .
303-3	Water withdrawal by source	<p>Key Metrics (Water)</p> <p>OMISSION: Information not available for 303-3: Although we have a couple wells and ponds in Michigan for irrigation purposes, the overwhelming majority of our water is provided by municipal sources, with consumption tracked through the utility water meters.</p>
GRI 305 Emissions 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topics, Energy & Emissions and Climate Change Impacts, align with GRI 305 Emissions.</p> <p>ESG Impact Assessment, Energy & Emissions</p>

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

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

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 401 Employment 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Talent Attraction, Development & Retention, aligns with GRI 401 Employment.</p> <p>ESG Impact Assessment, Talent Attraction, Development & Retention, Employee Engagement, Most Recent Diversity, Equity & Inclusion Progress Report</p>
103-2	The management approach and its components	<p>Talent Attraction, Development & Retention, Employee Engagement, Most Recent Diversity, Equity & Inclusion Progress Report, Comerica's 2020 10-K (Human Capital Disclosure, Pages 11-12)</p> <p>Comerica's Human Resource team is committed to partnering with the entire organization to help drive growth and shareholder value. The division is comprised of specialty areas overseeing talent attraction, learning and development, operations, total rewards, and human resources consulting.</p> <p>Talent Attraction: Our recruitment practices ensure that we hire the best candidates with the appropriate skill sets and values, pay competitive wages, and provide benefits that fit our demographics. We work hard to attract and retain the best talent from all backgrounds. Our Diversity Recruiting Strategy delivers a qualified diverse applicant pool that reflects the demographics of our markets though a focus on women, minority populations, LGBT, individuals with disabilities and veterans.</p>
		<p>Talent Development: Performance management at Comerica includes goals, results, behavioral expectations, and the development activities needed to support our colleagues. Comerica strives for a robust and efficient performance management process that incorporates system tools, and candid and constructive discussions between managers and colleagues to achieve both the company's objectives and our colleagues' goals. Comerica managers hold at least annual performance review discussions with their employees. Our managers are assessed against a Managing & Leading competency (skill) model during their performance review.</p> <p>Talent Retention (see employee benefits under GRI 401-2): Comerica offers career transition assistance to employees affected by job loss due to workforce reductions, including employment resources and career consultation at all levels. In addition, our Employee Assistance Program offers free and confidential support to colleagues and their families who are experiencing personal or professional difficulties.</p>

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 401 Employment 2016		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>To support the full spectrum of employee needs, we offer the following benefits to full-time employees: Medical¹, Dental¹, Vision¹, Accident¹, Critical Illness¹, Hospital Indemnity¹, Employee Assistance Program¹, Short-term Disability/Long-term Disability, Life Insurance, AD&D, and Dependent Life¹, 401(K) Plan and Employer Match¹, Retirement Income Account Plan¹, Employee Stock Purchase Plan¹, Health Accounts^{1,2}, Financial Counselling & Product Discounts, Paid Time Off Program¹, Paid Holidays¹, Group Legal¹, Tuition Assistance Program (TAP), and Financial Coaching³.</p> <p>¹ Benefits also offered to part-time employees scheduled to work at least 20 hours per week. ² Including Health and Dependent Care Flexible Spending Accounts, Commuter Benefits, and Health Savings Accounts. ³ Introduced in 2020.</p>
GRI 402 Labor/Management Relations 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Employee Engagement, aligns with GRI 402 Labor/Management Relations.</p> <p>ESG Impact Assessment, Colleagues, Employee Engagement</p>
103-2	The management approach and its components	<p>Colleagues, Talent Attraction, Development & Retention, Employee Engagement, Comerica's 2020 10-K (Human Capital Disclosure, Pages 11-12)</p> <p>Where needed, we have processes, procedures and policies in place to ensure the proper management of our efforts related to Employee Engagement, which are evaluated annually.</p> <p>On an annual basis, key impact topics are measured through a set of Key Performance Indicators that measure over performance both quantitatively and qualitatively. Employee engagement levels are measured with survey participation rates at the enterprise and line of business levels, sustainability scores and the robustness of the follow-up action plans.</p> <p>We keep our colleagues informed about company activities through a variety of communication channels, such as email, our intranet site, town halls ('Employee Owner Meetings') and one-on-one discussions with managers. The Comerica Café, part of our intranet site, helps colleagues further engage and share information with other colleagues. The Café includes blogs from Comerica leaders providing business, economic, government relations and sustainability-related insights. The site also includes fun ways to connect with other colleagues via photo albums about work (such as Comerica Pride, Volunteerism events, Partner Appreciation) and non-work (babies, sustainability at home, pets, travel), as well as discussion boards on recipes, health and wellness, travel tips, and hobbies.</p> <p>To support engagement and adoption, an organizational change management (OCM) team ensures all colleagues impacted by large Comerica initiatives are fully engaged in the change journey. The OCM service model supports business leaders as they engage colleagues in preparing for and adopting change.</p>

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

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

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

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

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Community Investment & Development (continued):</i></p> <p>The Community Reinvestment Act (CRA) of 1977 is a regulation that encourages financial institutions to address the needs of their entire communities, including those in low- and moderate-income (LMI) areas. We have a dedicated team of seven External Affairs market managers who are responsible for working with our community partners to support the needs of the markets where we operate. These market managers also identify opportunities where Comerica can support community projects and provide targeted products and services. We also have a CRA Compliance team that works closely with External Affairs to measure and consistently improve performance. A CRA Working Group of senior leaders ensures that established goals and benchmarks are met. For more details on Comerica's CRA progress, please review our Community Reinvestment Act page on Comerica.com.</p> <p>We require new External Affairs staff to take our in-house CRA training. Comerica also participates in peer bank meetings across our markets to benchmark our performance and share best practices in addressing CRA regulations and to achieve the greatest possible impact in our community development efforts. For more information, refer to the Community Reinvestment Act (CRA) page on Comerica.com.</p> <p>External Affairs trained 640 individuals on CRA-related topics in 2020, including External Affairs and other colleagues focused on community efforts, Executive Leadership and their direct reports, Comerica Incorporated Board of Directors and Comerica's Community Development Advisory Councils.</p> <p>One of the ways that Comerica supports our communities is through our investments in tax credit-financed real estate. Through this activity, Comerica provides a vital component of financing to community development projects, which address specific needs in low income communities by creating quality housing, nearby employment opportunities and social/educational services. All of our tax credit investments must be qualified for CRA credit. Furthermore, our tax credit investing enables us to direct financial resources to the communities where we have the strongest connections and in ways that have the greatest social impact. Our investments help create housing developments with targeted tenancy such as people at the lowest income ranges, residents with special needs, military service veterans and senior members in our markets. Additionally, some investment activity is used to preserve affordability in locations experiencing increases in rental rates. Further investment activity stimulates business investment in distressed communities. Our investment actions help achieve positive social impacts for communities that goes beyond typical financing activities. Comerica's investments in qualified tax credit developments help create stable communities and support families with high-quality affordable housing alternatives.</p> <p>In July 2020, Comerica distributed its first Comerica Community Insights e-newsletter to communicate changes underway, to help our community partners informed about available tools and resources, and to share our national response to COVID-19. The e-newsletter was distributed to Comerica's National CDAC members, nonprofit community partners and centers of influence.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Financial Inclusion & Financial Education:</i></p> <p>Coupled with the Comerica Money \$ense program, the bank has developed the Comerica Financial Education Brigade (CFEB), a collection of employee volunteers dedicated to improving the community through financial empowerment. Among other programs, the CFEB supports small businesses through Comerica Business \$ense Boot Camps, SCORE, Pacific Community Ventures and Revive Dallas Small Business Relief Fund - Fast Start Mentoring Program. The CFEB supports Young Entrepreneurz Solutions and Network for Teaching Entrepreneurship, those considering home ownership through our recent partnership with Dallas Area Habitat for Humanity and serving low- and moderate-income (LMI) women and girls in need through our partnership with 50/50 Leadership. All CFEB members are trained in order to teach financial education on behalf of Comerica. Comerica's External Affairs Managers conduct CFEB training each quarter. In 2020, we had 753 Comerica colleagues within the Comerica Financial Education Brigade.</p> <p>Comerica regularly evaluates our physical locations in the communities we serve. Periodically, we relocate or consolidate banking centers to more convenient and visible locations for our customers. We also refurbish older banking centers to improve environmental performance, improve the efficiency of the delivery of our services and enhance the customer experience. In addition, we are investing in broadening access to our services through our digital offerings. To serve our non-English speaking customers, we offer Spanish language options on our ATMs, Comerica.com, and in the Customer Contact Center. Both English- and Spanish-speaking agents are available in our Customer Contact Centers and we offer translator services to assist customers in other languages, as needed. In addition, Comerica abides by the Americans With Disabilities Act (ADA) and provides services for visual and/or hearing-impaired customers.</p> <p>Comerica's Customer Contact Center launched a multi-phased project in 2018 to apply next-generation and natural language speech technologies to its Interactive Voice Response (IVR) system. This offered customers easier access to their account information and to make transactions 24 hours a day, 7 days a week. In 2019, enhanced authentication was added using to protect customer accounts from fraudulent activity using VoiceSafe – a customer-initiated voice print feature. In 2020, due to the COVID-19 pandemic, additional customer service representatives were added to support the increased call volume.</p> <p>To meet the needs of the underbanked, we have tailored products, such as the Comerica Secured Credit Card, which is an entry-level, cash-secured credit card that helps those who do not qualify for a traditional credit card build credit history. In addition to helping expand our customers' access to credit, we offer the Access Checking account with a flat monthly fee, or no fee with direct deposit. We also offer a Statement Savings account, which has no monthly maintenance fee if the customer maintains any Comerica personal checking account and encourages good saving habits. Finally, we are currently working on improving the customer experience by making it easier for customers to open accounts at their convenience through Comerica's online account opening platform.</p> <p>In 2008, 2014 and again in 2020, Comerica Bank was selected by the U. S. Treasury as the Financial Agent for their Direct Express® Debit MasterCard® Program. Comerica Bank is the exclusive issuer of the Direct Express® debit card for federal benefit recipients. Since 2013, the U.S. Treasury has required all federal benefit recipients (with a few grandfathered exceptions) to receive their monthly benefits electronically, either by direct deposit or through the Direct Express® debit card.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Financial Inclusion & Financial Education (continued):</i></p> <p>Direct Express® Key Metrics:</p> <ul style="list-style-type: none"> • Serves 4.5 million federal benefit recipients • Comerica has achieved a 92% (or better) cardholder satisfaction rating • One of the most secure prepaid cards in the industry with 100 percent of cardholders using EMV chip and PIN <p>Helping Millions of Americans Join the Financial Mainstream: Helping the U.S. Treasury provide millions of Americans ready, safe access to their government benefits was the founding mission of the Direct Express® Program. Not only does the innovative prepaid card program deliver benefits more cost effectively and securely, it is an on-ramp to financial inclusion for millions of unbanked Americans - giving recipients the tools they need to participate fully in the economy. Now, on average, over 4.5 million federal benefit recipients receive their benefits (Social Security, Veterans, Civil Service, Railroad Retirement, etc.) electronically through the Direct Express® card. Direct Express® transactions are covered by regulations that protect federal benefit recipients, and funds on the cards are FDIC insured. Cardholder satisfaction with the Direct Express® program is high - Comerica has achieved a 92% (or better) cardholder satisfaction rating every year since the program's inception.</p> <p>Protecting Vulnerable Benefit Recipients from Fraud: We began issuing EMV cards to Direct Express® cardholders in 2015 and have reissued 100 percent of Direct Express® portfolio with EMV chip and PIN technology. Because Direct Express® was the first large-scale prepaid card program to offer EMV, we used a comprehensive communications campaign to educate cardholders on the use, security and benefits of chip cards. With 100% of our cardholders using EMV chip and PIN, the Direct Express® card protects vulnerable cardholder funds and is one of the most secure prepaid cards in the industry.</p> <p>Meeting Cardholders Where They Are: Direct Express® has a unique partnership with Walmart that allows Direct Express® cardholders to withdraw the full balance on their card (up to \$1,000) at less than half the cost that Walmart charges other customers for the same service. Since 90 percent of our cardholders visit a Walmart at least once a year, this has proven to be a very popular service.</p> <p>Empowering Beneficiaries with Financial Education: Comerica sees education as a critical part of our mission, especially in the case of the Direct Express® program. With 46% of our cardholders never using a financial service prior to Direct Express®, financial education is key to a good experience with the program. In order to engage beneficiaries and improve their financial health, Comerica and Mastercard have partnered with Everfi to provide educational modules for cardholders to utilize.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-2	The management approach and its components (continued)	<p><i>Volunteerism & Philanthropy:</i></p> <p>Serving our communities is at the core of who we are at Comerica and what makes our colleagues stand out. Our volunteer efforts positively impact our reputation and the ability to meet our business goals. It also allows us to fulfill the promise we have made to our communities, customers and our colleagues.</p> <p>We strive to be a leader in giving back to our communities through our colleagues' volunteering and board participation in our key markets. To achieve this, each primary market has a Local Community Involvement Coordinator, who works with our Senior Diversity & Inclusion Consultant- Social Impact Practices leader to ensure that volunteering goals are met and that we follow best practice in delivering these commitments. In each of our markets, we set annual goals for volunteer hours and managers are requested to lead by example and encourage other colleagues to contribute their time.</p> <p>Since 2011, our Donate 8 initiative has challenged colleagues to spend eight hours or more of personal time per year on community service activities. To encourage colleagues to record their community volunteer hours, we updated the program in 2014 to provide incentives for participation. Sharing our expertise in addition to our time is an important aspect of our approach to volunteerism, so in addition to Donate 8, we also encourage senior managers to participate on community nonprofit boards.</p> <p>We have processes, procedures, and policies in place to ensure that our financial support aligns with our giving priorities, we utilize our charitable contributions in the most prudent manner, and our program is legally compliant. We define our success by ensuring that we diversify our giving portfolio to maximize our impact in our markets, support financially stable organizations that are responsive to the needs of the communities which they serve, and consistently review and evaluate the impact of our charitable giving.</p>
		<p>Comerica Community Update- COVID-19 Response Report, Community, Community Investment & Development, Volunteerism & Philanthropy, Diversity Commitment, Comerica Charitable Giving, CRA, Business Risk Management, Key Metrics (Community)</p> <p><i>Community Investment & Development:</i></p> <p>In 2020, the External Affairs team swiftly and effectively changed course to continue to meet basic needs of small businesses during COVID such as food insecurities and PPE and provide support for small businesses. In March 2020, Comerica Bank and Comerica Charitable Foundation committed the first \$4 Million to COVID relief and CDFIs, followed by a second \$4 Million commitment in May 2020 and a \$10 Million investment in Minority Depository Institutions in Michigan, Texas and California in August 2020. Comerica remained focused on meeting the needs of small businesses impacted by COVID-19. Comerica's participation in the Small Business Association Paycheck Protection Program (PPP), a federal program designed to keep employees on payroll, offered financial relief to thousands of businesses. The support provided by Comerica through the program resulted in more than 14,700 loans processed totaling \$3.9 billion in PPP loans funded in 2020.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 413 Local Communities 2016		
103-3	Evaluation of the management approach (continued)	<i>Community Investment & Development (continued):</i> In October 2020, Comerica named Beatrice Kelly as Director of Community Development Lending, who is responsible for growing Comerica’s community development lending efforts. In June 2020, Comerica made a \$10MM investment in a \$41MM New Market Tax Credit Fund, which accounted for a 24% ownership. Comerica’s investment went to six developments in qualified low-income communities and provided benefits such as: (1) permanent/ construction job creations in Michigan and Texas; (2) access to affordable, fresh and healthy food through the construction and redevelopment of a grocery store in a low-income community in Kalamazoo, MI, and (3) programming to serve low-income and special needs children in San Antonio and increasing the hot meal capacity of a local Housing Food Bank. Our Community team evaluates our socioeconomic compliance in terms of our CRA performance on an ongoing basis. Results of these assessments are shared with executive management and adjustments made to improve our performance in targeted areas. <i>Volunteerism & Philanthropy:</i> Due to COVID 19, we have pivoted our financial education programming to offer online training and provide virtual volunteering opportunities through which our colleagues were still able to make a difference. In 2020, we pivoted from our traditional approach for funding community partners. We Identified nonprofit partners who historically had a track record and specialization in responding to disaster relief to directly support COVID-19 relief efforts. We reallocated, increased and accelerated funding to these organizations.
413-2	Operations with significant actual and potential negative impacts on local communities	For additional information, please visit Community Reinvestment page on Comerica.com . OMISSION: Information not available. Operations with significant actual and potential negative impacts on local communities not provided.
GRI 415 Public Policy 2016		
103-1	Explanation of the material topic and its Boundary	Our GRI Impact Topic, Public Policy & Government Relations, aligns with GRI 415 Public Policy. ESG Impact Assessment , Public Policy & Government Relations , Political Activities and Contributions Public Policy & Government Relations , Political Activities and Contributions
103-2	The management approach and its components	Due to the potential magnitude of regulatory impact, it is prudent to stay actively involved in the public policy process. Our advocacy efforts, led by our Director of Government Relations, are focused at the federal level and in our key markets: Texas, Arizona, California, Florida and Michigan. Our executives meet with elected officials and engage with national and state banking industry trade associations. We work with these associations to advocate on behalf of the regional banking industry and target legislation or regulation that impacts the products and services we offer.

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 415 Public Policy 2016		
103-2	The management approach and its components (continued)	<p>Major Industry Associations Engaged • American Bankers Association • The Clearing House Association • Bank Policy Institute • Consumer Bankers Association • Texas Bankers Association • California Bankers Association • Michigan Bankers Association • Arizona Bankers Association • Florida Bankers Association</p> <p>Current public policy challenges facing Comerica include legislative and regulatory efforts to limit or prohibit certain services and fees provided by banks and remaining engaged in the debate over such ongoing legislative issues as consumer privacy, cybersecurity, and Community Reinvestment Act (CRA) modernization.</p> <p>With respect to public policy for environmental and climate change issues, we annually review organizations where Comerica colleagues occupy board-level roles. We hold follow-up discussions with relevant board member colleagues whose organization's policies and positions conflict with Comerica's corporate climate and sustainability strategy. In 2020, we did not identify any such conflicts.</p>
103-3	Evaluation of the management approach	<p>Political Activities and Contributions</p> <p>Our primary public policy engagement activities are led by our Government Relations office, evaluated by our executive leadership on an ongoing basis, and adjusted as appropriate when conditions warrant.</p>
415-1	Political contributions	Key Metrics (Responsible Business) , Political Activities and Contributions
GRI 417 Marketing and Labeling 2016		
103-1	Explanation of the material topic and its Boundary	This is not a Comerica GRI Impact Topic.
103-2	The management approach and its components	This is not a Comerica GRI Impact Topic.
103-3	Evaluation of the management approach	This is not a Comerica GRI Impact Topic.
417-2	Incidents of non-compliance concerning product and service information	There were no significant fines in 2020 for non-compliance with laws and regulations concerning the provision and use of products and services that would have a material adverse effect on our operations or ability to perform the services we offer.

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 418 Customer Privacy 2016		
103-1	Explanation of the material topic and its Boundary	<p>Our GRI Impact Topic, Privacy and Information Protection, aligns with GRI 418 Customer Privacy.</p> <p>ESG Impact Assessment, Customers, Privacy & Information Protection, Security Commitment</p> <p>2020 Annual Report</p> <p>Privacy and information protection, and related cybersecurity efforts, are the responsibility of Comerica's comprehensive and frequently updated Enterprise Information Protection Framework:</p> <ol style="list-style-type: none"> Strategy and Governance Risk Management Controls Training Monitoring and Testing Response and Recovery Program Maintenance
103-2	The management approach and its components	<p>The goals of the Enterprise Information Protection Framework are:</p> <ol style="list-style-type: none"> Protect valuable information and information technology resources Ensure the security and confidentiality of customer records and corporate information Protect against unauthorized access to or use of such records Detect, prevent and mitigate identity theft in connection with covered accounts Provide security protections that are consistent with the value of the information asset Protect the legal position of the company Ensure compliance with regulatory guidelines for protecting information assets <p>For 2020, the global shift to remote work presented opportunities for enhancing our controls with a period of assimilation for all colleagues to meet the added demands and expectations. We initiated a process to enhance pertinent controls and, in partnership with our technology operations team, provided frequent communications to our colleagues on work from home guidelines as aligned to our policies and standards.</p>
103-3	Evaluation of the management approach	<p>To evaluate the program's effectiveness, business units conduct risk control self-assessments, external regulatory examiners carry out comprehensive evaluations, and we implement three lines of defense built on internal audits, oversight and effective challenge, and our continuous monitoring program. The Enterprise Risk Committee of Comerica's Board of Directors oversees the program's overall status, effectiveness of policies and procedures, material risk issues, risk management, control decisions, and service provider oversight. The committee also reviews management responses to security incidents, including those involving identity theft or personal health information, and recommendations for program changes. The program is administered by our Chief Risk Officer, Chief Information Officer, Chief Information Security Officer and Chief Technology Risk & Operational Risk Officer who all work closely with the Enterprise Risk Committee to monitor and continuously improve the program in response to changing risk environments. Our approach to managing customer privacy has proven effective and adjustments to our approach are made as needed in line with our overall risk management strategies.</p>

GRI Standard Disclosure Number	GRI Standard Disclosure Title	Response/Reference/Omission
GRI 400 Social Standards Series		
GRI 418 Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Key Metrics-Customers Comerica was not subject to fines or non-monetary sanctions in 2020 for non-compliance with personal protection data laws, nor were there any breaches of customer information by our company that would have a material adverse effect on our operations or ability to perform the services we offer.
GRI 419 Socioeconomic Compliance 2016		
103-1	Explanation of the material topic and its Boundary	Our Impact Topic, Community Investment & Development, aligns with GRI 419 Socioeconomic Compliance. ESG Impact Assessment , Business Risk Management , Community Investment & Development
103-2	The management approach and its components	Community Investment & Development ; Community Reinvestment Act page on Comerica.com ; Refer to GRI 413: Local Communities (103-2)
103-3	Evaluation of the management approach	Community Reinvestment Act page on Comerica.com ; Refer to GRI 413: Local Communities (103-3) Our Community team evaluates our socioeconomic compliance in terms of our CRA performance on an ongoing basis. Results of these assessments are shared with executive management and adjustments made to improve our performance in targeted areas.
419-1	Non-compliance with laws and regulations in the social and economic area	No significant fines or non-monetary sanctions for non-compliance with laws or regulations in 2020 that would have a material adverse effect on our operations or ability to perform the services we offer.
Comerica Impact Topic: Innovation & Technology		
103-1	Explanation of the material topic and its Boundary	Our Impact Topic, Technology & Innovation, does not align with a specific GRI disclosure. ESG Impact Assessment , Innovation & Technology
103-2	The management approach and its components	Innovation & Technology At Comerica, we utilize technology and innovation to enhance our organization and strengthen our relationship-based approach to banking. Comerica's technology teams partner with our lines of business to understand the marketplace and offer data-directed products to help meet the needs of our customers. Our transformational efforts are creating a more data-driven, digitally-centric bank built on a foundation of continuous investment in key technologies and capabilities. Cybersecurity is an essential component of our technology strategy, and we work to keep Comerica and our customers secure. We focus on prevention and protection from issues that threaten customer privacy and security (see Privacy & Information Protection for more details).

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

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

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

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

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

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

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