

GRI Standards Content Index

This is a supplement to the 2022 Comerica Corporate Responsibility Report. Please review the Corporate Responsibility Report in its entirety for more details.

Please note: In our Corporate Responsibility Report, we use the term “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.

We have 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 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.

Statement of use	Comerica Incorporated has reported the information cited in this GRI content index for the period January 1, 2022 to December 31, 2022 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
GRI 2: General Disclosures 2021		
2-1 Organizational details	a. Report its legal name;	a. Name of the organization: Comerica Incorporated (NYSE: CMA)
	b. Report its nature of ownership and legal form;	b. Ownership and legal form: Incorporated under the laws of the State of Delaware in 1973
	c. Report the location of its headquarters;	c. Location of headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201
	d. Report its countries of operation.	d. Location of operations: North American Presence: Our Company
2-2 Entities included in the organization’s sustainability reporting	a. List all its entities included in its sustainability reporting;	a. Reporting Methodology

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-3 Reporting period, frequency and contact point	a. Specify the reporting period for, and the frequency of, its sustainability reporting;	a. Corporate Responsibility Reporting period: January 1, 2022 to December 31, 2022 Reporting cycle: Annual
	b. Specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;	b. Financial Reporting period: January 1, 2022 to December 31, 2022
	c. Report the publication date of the report or reported information;	c. Publication date of the report: June 2023
	d. Specify the contact point for questions about the report or reported information.	d. Contact point for questions regarding the report: To learn more about sustainability and corporate responsibility at Comerica, visit us at Comerica.com . To provide feedback on our reporting, contact Scott Beckerman, Director of Corporate Sustainability, at jsbeckerman@comerica.com .
2-4 Restatements of information	a. Report restatements of information made from previous reporting periods and explain:	a. to a-ii. There were no material restatements of information provided in this report. The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our 2022 Comerica Incorporated Annual Report (herein referred to as 2022 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2022. References to the “Board” refer to the Board of Directors of Comerica Incorporated.
	a-i. the reasons for the restatements;	
	a-ii. the effect of the restatements.	
2-5 External assurance	a. Describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;	a. 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).
	b. If the organization’s sustainability reporting has been externally assured:	b. 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).
	b-i. provide a link or reference to the external assurance report(s) or assurance statement(s);	b-i. GHG Emissions Verification Declaration
	b-ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;	b-ii. GHG Emissions Verification Declaration
	b-iii. describe the relationship between the organization and the assurance provider.	b-iii. GHG Emissions Verification Declaration
2-6 Activities, value chain and other business relationships	a. Report the sector(s) in which it is active;	a. 2022 Annual Report: Item 1. Business — General, page 1
	b. Describe its value chain, including:	See breakdown below.
	b-i. the organization’s activities, products, services, and markets served;	b-i. Our Company 2022 Annual Report: Item 1. Business — General, page 1; Item 2. Properties, page 24; Financial Review and Reports — Notes to Consolidated Financial Statements — Note 22 - Strategic Lines of Business, pages F-91 to F-94

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-6 Activities, value chain and other business relationships	b-ii. the organization's supply chain;	b-ii. Supplier Diversity, Supporting Supply Chain Sustainability, Key Metrics-DEI 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. We look to source suppliers and services that meet our environmental criteria, where possible. In 2022, Comerica engaged with nearly 4,600 active suppliers and an annual supplier spend of over \$802 million dollars. 45% of our supply base (by number of suppliers) and 30% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,152 suppliers in Michigan and 916 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.
	b-iii. the entities downstream from the organization and their activities;	b-iii. Customers, Community
2-7 Employees	a. Report the total number of employees, and a breakdown of this total by gender and by region;	a. Key Metrics-Colleagues 2022 Annual Report , page 2 of PDF
	b. Report the total number of:	See breakdown below.
	b-i. permanent employees, and a breakdown by gender and by region;	b-i. Key Metrics-Colleagues
	b-iv. full-time employees, and a breakdown by gender and by region;	b-iv. Colleagues, Key Metrics-Colleagues 2022 Annual Report : Item 1. Business — Human Capital Resources, pages 11-13
	b-v. part-time employees, and a breakdown by gender and by region;	b-v. Colleagues, Key Metrics-Colleagues 2022 Annual Report : Item 1. Business — Human Capital Resources, pages 11-13
	c-i. in head count, full-time equivalent (FTE), or using another methodology;	c-i. Key Metrics-Colleagues 2022 Annual Report : Item 1. Business — Human Capital Resources, pages 11-13 CDP Climate Change Response
	c-ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;	c-ii. Employee data provided for year-end 2022.
	e. Describe significant fluctuations in the number of employees during the reporting period and between reporting periods.	e. 2022 Annual Report : Item 1. Business — Human Capital Resources, pages 11-13. There are no seasonal variations in employment.
2-8 Workers who are not employees	a. Report the total number of workers who are not employees and whose work is controlled by the organization and describe:	a. The majority of work is performed by Comerica payrolled employees. Non-employee contingent workers represented 16.5% of our total workforce at year-end 2022. At Comerica, we track all contingent workers who access our systems by adding them to our human resource information system.
	b-i. in head count, full-time equivalent (FTE), or using another methodology;	b-i. Percentage provided in 2-8.a on FTE basis.
	b-ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;	b-ii. Contingent worker data provided for year-end 2022.

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-9 Governance structure and composition	a. Describe its governance structure, including committees of the highest governance body;	a. 2023 Proxy Statement: Proposal 1: Election of Directors — Committees and Meetings of Directors, pages 21-23; Proposal 1: Election of Directors — Board Leadership Structure, page 23
	b. List the committees of the highest governance body that are responsible for decision-making on and overseeing the management of the organization's impacts on the economy, environment, and people;	b. Oversight of Corporate Responsibility at Comerica 2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4; Proposal 1: Election of Directors — Board and Committee Governance — Board Oversight, page 20 TCFD Report CDP Climate Change Response
	c. Describe the composition of the highest governance body and its committees by:	See breakdown below.
	c-i. executive and non-executive members;	c-i. 2023 Proxy Statement: Proposal 1: Election of Directors — Committees and Meetings of Directors, pages 21-23; Proposal 1: Election of Directors — Board Leadership Structure, page 23
	c-ii. independence;	c-ii. 2023 Proxy Statement: Executive Summary — Board Nominees, page 8; Proposal 1: Election of Directors — Director Independence, pages 26-27
	c-iii. tenure of members on the governance body;	c-iii. 2023 Proxy Statement: Executive Summary — Board Nominees, page 8; Proposal 1: Election of Directors — Information About Nominees, pages 12-18
	c-iv. number of other significant positions and commitments held by each member, and the nature of the commitments;	2023 Proxy Statement: Executive Summary — Board Nominees, page 8; Proposal 1: Election of Directors — Information About Nominees, pages 12-18
2-10 Nomination and selection of the highest governance body	c-v. gender;	c-v. Workforce and Board Diversity; Key Metrics — Diversity, Equity & Inclusion 2023 Proxy Statement: Executive Summary — Director Qualifications, Experience and Demographics, page 10
	c-vi. under-represented social groups;	c-vi. Workforce and Board Diversity; Key Metrics — Diversity, Equity & Inclusion 2023 Proxy Statement: Executive Summary — Director Qualifications, Experience and Demographics, page 10
	c-vii. competencies relevant to the impacts of the organization;	c-vii. 2023 Proxy Statement: Executive Summary — Director Qualifications, Experience and Demographics, page 9; Proposal 1: Election of Directors — Information About Nominees, pages 12-18
	a. Describe the nomination and selection processes for the highest governance body and its committees;	a. 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
	b. Describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:	b. 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3
	b-i. views of stakeholders (including shareholders);	b-i. 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3
	b-ii. diversity;	b-ii. Workforce and Board Diversity; Key Metrics — Diversity, Equity & Inclusion 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3
	b-iii. independence;	b-iii. 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3; 4. Director Qualifications and Independence, pages 4-8
	b-iv. competencies relevant to the impacts of the organization.	b-iv. Workforce and Board Diversity 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Nominee Selection Process, pages 19-20 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3
2-11 Chair of the highest governance body	a. Report whether the chair of the highest governance body is also a senior executive in the organization;	a. 2023 Proxy Statement: Proposal 1: Election of Directors — Board Leadership Structure, page 23
	b. If the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.	b. 2023 Proxy Statement: Proposal 1: Election of Directors — Board Leadership Structure, page 23
2-12 Role of the highest governance body in overseeing the management of impacts	a. Describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;	a. Oversight of Corporate Responsibility at Comerica, DEI Governance and Priorities 2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4 TCFD Report
	b. Describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including:	b. Oversight of Corporate Responsibility at Comerica, DEI Governance and Priorities 2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4; Proposal 1: Election of Directors — Board and Committee Governance — Board Oversight, page 20. TCFD Report

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
	b-i. whether and how the highest governance body engages with stakeholders to support these processes;	b-i. 2023 Proxy Statement: Proposal 1: Election of Directors — Board Leadership Structure (facilitating director duties), page 23
	c. Describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review.	c. 2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4
2-13 Delegation of responsibility for managing impacts	a. Describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including:	<p>a. Oversight of Corporate Responsibility at Comerica, DEI Governance and Priorities</p> <p>2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4; Proposal 1: Election of Directors — Board and Committee Governance — Board Oversight, page 20</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>
	a-i. whether it has appointed any senior executives with responsibility for the management of impacts;	<p>a-i. Our Corporate Responsibility Approach; Oversight of Corporate Responsibility at Comerica; DEI Governance and Priorities</p> <p>2023 Proxy Statement: Executive Summary — Governance Overview and ESG Governance, page 4; Proposal 1: Election of Directors — Board and Committee Governance — Board Oversight, page 20</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>
	b. Describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people.	<p>b. Oversight of Corporate Responsibility at Comerica; DEI Governance and Priorities</p> <p>2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Board Oversight, page 20</p> <p>CDP Climate Change Response</p>
2-14 Role of the highest governance body in sustainability reporting	b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this.	b. Our Executive Vice President of Corporate Responsibility, member of the Management Executive Committee, reviews and approves Comerica's Corporate Responsibility Report.

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-15 Conflicts of interest	<p>a. Describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;</p> <p>b. Report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to:</p> <p>b-iv. related parties, their relationships, transactions, and outstanding balances.</p>	<p>a. Corporate Governance Guidelines — 4. Director Qualifications and Independence, pages 4-8 Code of Business Conduct and Ethics for Members of the Board of Directors</p> <p>b. Code of Business Conduct and Ethics for Members of the Board of Directors: Conflicts of Interest, pages 1-3</p> <p>b-iv. 2023 Proxy Statement: Proposal 1: Election of Directors — Transactions with Related Persons, pages 24-25; Proposal 1: Election of Directors — Director Independence — Director Transactions, Relationships or Arrangements by Category or Type, page 27 2022 Annual Report: Financial Review and Reports — Notes to Consolidated Financial Statements — Note 19 - Transactions with Related Parties, page F-88</p>
2-16 Communication of critical concerns	<p>a. Describe whether and how critical concerns are communicated to the highest governance body;</p>	<p>a. 2023 Proxy Statement: Proposal 1: Election of Directors — Non-Management Directors and Communication with the Board, page 23 Corporate Governance Guidelines — 12. Shareholder Access to Directors/Process for Sending Communications, page 10</p>
2-17 Collective knowledge of the highest governance body	<p>a. Report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.</p>	<p>a. Corporate Governance Guidelines — 19. Director Orientation and Continuing Education, page 12</p>
2-18 Evaluation of the performance of the highest governance body	<p>a. Describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people;</p> <p>b. Report whether the evaluations are independent or not, and the frequency of the evaluations;</p>	<p>a. 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Annual Self-Evaluation, page 19 Corporate Governance Guidelines — 21. Annual Performance Evaluation, page 13</p> <p>b. Frequency of the evaluations: Annual Corporate Governance Guidelines — 21. Annual Performance Evaluation, page 13</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-19 Remuneration policies	a. Describe the remuneration policies for members of the highest governance body and senior executives, including:	a. to a-ii. 2023 Proxy Statement: Proposal 1: Election of Directors — Compensation of Directors, pages 27-30; Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis, pages 41-61
	a-i. fixed pay and variable pay;	Corporate Governance Guidelines — 10. Stock Ownership, pages 9-10
	a-ii. sign-on bonuses or recruitment incentive payments;	
	a-iii. termination payments;	a-iii. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Other Compensation Practices and Policies — Employment Contracts and Severance or Change of Control Agreements, pages 57-58; Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Potential Payments Upon Termination or Change Of Control At Fiscal Year-End 2022, pages 75-77
	a-iv. clawbacks;	a-iv. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Other Compensation Practices and Policies — Clawback Policies, pages 59-60
a-v. retirement benefits;	a-v. 2023 Proxy Statement: Proposal 1: Election of Directors — Compensation of Directors, pages 27-30; Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation — Retirement Benefits, page 55; Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Pension Benefits at Fiscal Year-End 2022, pages 71-72	
	b. Describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.	b. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Annual Executive Incentive (Short-Term Cash Incentive) — 2022 AEI Goals, pages 48-51
2-20 Process to determine remuneration	a-i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration;	a-i. 2023 Proxy Statement: Proposal 1: Election of Directors — Compensation of Directors, pages 27-30; Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Shareholder Outreach & Compensation Philosophy — Roles and Responsibilities, page 43 Corporate Governance Guidelines — 18. Director Compensation, page 12
	a-ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration;	a-ii. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Shareholder Outreach & Compensation Philosophy — Shareholder Outreach, page 41
	a-iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives;	a-iii. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Shareholder Outreach & Compensation Philosophy — Roles and Responsibilities, page 43
	b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.	b. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Shareholder Outreach & Compensation Philosophy — Shareholder Outreach, page 41

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-21 Annual total compensation ratio	a. Report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);	a. 2023 Proxy Statement: Pay Ratio Disclosure, page 85
	c. Report contextual information necessary to understand the data and how the data has been compiled.	c. 2023 Proxy Statement: Pay Ratio Disclosure, page 85
2-22 Statement on sustainable development strategy	a. Report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.	a. Message from Our Chairman, President and CEO
2-23 Policy commitments	a. Describe its policy commitments for responsible business conduct, including:	a. Climate Change; Enterprise Security; Compliance and Ethics (Codes of Ethics and Supplier Conduct); Human Rights
		Diversity Commitment
		Corporate Governance Guidelines , page 11
		Code of Business Conduct and Ethics for Employees , pages 1-22
		Senior Financial Officer Code of Ethics , pages 1-4
		Code of Business Conduct and Ethics for Members of the Board of Directors , pages 1-5
		Environmental Policy Statement
		Anti-Discrimination Policy and Funding Limitations
		TCFD Report
	a-i. the authoritative intergovernmental instruments that the commitments reference;	a-i. Compliance and Ethics (Supplier Conduct)
	a-iv. whether the commitments stipulate respecting human rights;	a-iv. Human Rights Statement

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-23 Policy commitments	b. Describe its specific policy commitment to respect human rights, including:	b. Human Rights; Compliance and Ethics (Supplier Conduct); Human Rights Statement
	b-i. the internationally recognized human rights that the commitment covers;	b-i. Human Rights; Human Rights Statement
	b-ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment;	b-ii. Human Rights; Human Rights Statement
	c. Provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this;	c. Human Rights; Human Rights Statement
	d. Report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level;	d. Human Rights; Human Rights Statement
	e. Report the extent to which the policy commitments apply to the organization's activities and to its business relationships;	e. Human Rights; Compliance and Ethics (Supplier Conduct); Human Rights Statement 2023 Proxy Statement: Proposal 1: Election of Directors — Board and Committee Governance — Code of Ethics, page 20 2022 Annual Report: Item 10. Directors, Executive Officers and Corporate Governance, page 26 Code of Business Conduct and Ethics for Members of the Board of Directors , pages 1-5 Senior Financial Officer Code of Ethics , pages 1-4. Code of Business Conduct and Ethics for Employees , pages 1-22
f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties.	f. Compliance and Ethics — Communication and Training	
2-24 Embedding policy commitments	a-iv. training that the organization provides on implementing the commitments.	a-iv. Compliance and Ethics — Communication and Training Environmental Policy Statement
2-26 Mechanisms for seeking advice and raising concerns	a. Describe the mechanisms for individuals to:	a. See breakdown below.
	a-i. seek advice on implementing the organization's policies and practices for responsible business conduct;	a-i. Code of Business Conduct and Ethics for Employees
	a-ii. raise concerns about the organization's business conduct.	a-ii. Compliance and Ethics — Reporting and No Retaliation Policy Corporate Governance Guidelines — 14. Procedure for Handling Complaints regarding Accounting or Auditing Matters, page 11 Code of Business Conduct and Ethics for Employees

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
2-27 Compliance with laws and regulations	c. describe the significant instances of non-compliance;	c. We are not aware of any incidents of non-compliance with laws and regulations in 2022 that would have a material adverse effect on our operations or ability to perform the services we offer.
2-28 Membership associations	a. Report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role.	a. Trade Associations CDP Climate Change Response
2-29 Approach to stakeholder engagement	a. Describe its approach to engaging with stakeholders, including:	a. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement ESG Impact Assessment
	a-i. the categories of stakeholders it engages with, and how they are identified;	a-i. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement ESG Impact Assessment
	a-ii. the purpose of the stakeholder engagement;	a-ii. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement ESG Impact Assessment
2-30 Collective bargaining agreements	a. Report the percentage of total employees covered by collective bargaining agreements;	a. and b. Comerica does not have employees under collective bargaining agreements.
GRI 3: Material Topics 2021		
3-1 Process to determine material topics	a. Describe the process it has followed to determine its material topics, including:	a. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement — Our Impact Assessment Process ESG Impact Assessment
	a-i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;	a-i. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement — Our Impact Assessment Process ESG Impact Assessment
	a-ii. how it has prioritized the impacts for reporting based on their significance;	a-ii. ESG Impact Assessment
	b. specify the stakeholders and experts whose views have informed the process of determining its material topics.	b. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement — Our Impact Assessment Process ESG Impact Assessment
3-2 List of material topics	a. list its material topics;	a. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement — Stakeholder Engagement ESG Impact Assessment
	b. report changes to the list of material topics compared to the previous reporting period.	b. Corporate Responsibility at Comerica — Impact and Stakeholder Engagement — Updating Impact Topics
3-3 Management of material topics	c. Describe its policies or commitments regarding the material topic;	c. 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 Environmental Policy Statement Anti-Discrimination Policy and Funding Limitations

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
3-3 Management of material topics	d. Describe actions taken to manage the topic and related impacts, including:	<p>d. Customers; Colleagues; Diversity, Equity and Inclusion; Community; Environment; Responsible Business</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>
	d-i. actions to prevent or mitigate potential negative impacts;	<p>d-i. Responsible Marketing and Sales; Diversity, Equity and Inclusion — Educating our Colleagues; Driving Sustainability Engagement and Awareness; Business Risk Management; Enterprise Security; Privacy and Data Protection; Compliance and Ethics</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>
	e-i. processes used to track the effectiveness of the actions;	<p>e-i. Responsible Marketing and Sales; Environment — Tracking Our Progress; Enterprise Security; Privacy and Data Protection; Compliance and Ethics; Fair and Responsible Banking; Public Policy and Government Relations</p>
	e-ii. goals, targets, and indicators used to evaluate progress;	<p>e-ii. Small Business Support; DEI Governance and Priorities; Supplier Diversity; Volunteering Goals; Reducing GHG Emissions; Reducing Paper, Waste and Water Impacts; Enterprise Security; Key Metrics Tables</p> <p>2023 Proxy Statement: Executive Summary — pages 5-7</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>
	e-iii. the effectiveness of the actions, including progress toward the goals and targets;	<p>e-iii. Small Business Support; DEI Governance and Priorities; Supplier Diversity; Volunteering Goals; Reducing GHG Emissions; Reducing Paper, Waste and Water Impacts; Key Metrics Tables</p> <p>2023 Proxy Statement: Executive Summary — pages 5-7</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
GRI 201: Economic Performance 2016	This is not a Comerica GRI Impact Topic.	
201-1 Direct economic value generated and distributed	a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization’s global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:	See breakdown below.
	a-i. Direct economic value generated: revenues;	a-i. Key Metrics — Our Company 2023 Proxy Statement: Executive Summary — 2022 Financial Performance and 2022 Peer Comparisons, page 3 2022 Annual Report: Financial Review and Reports — Notes to Consolidated Financial Statements — Note 24 - Revenue from Contracts with Customers, page F-98
	a-ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;	a-ii. Key Metrics— Customers; Key Metrics — Our Company; Key Metrics — Community 2023 Proxy Statement: Executive Summary — Volunteerism & Community in 2022, page 7
201-2 Financial implications and other risks and opportunities due to climate change	a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including:	a. CDP Climate Change Response TCFD Report 2022 Annual Report: Item 1A. Risk Factors — General Risk, page 23

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
201-2 Financial implications and other risks and opportunities due to climate change	a-i. a description of the risk or opportunity and its classification as either physical, regulatory, or other;	a-i. CDP Climate Change Response TCFD Report 2022 Annual Report: Item 1A. Risk Factors — General Risk, page 23
	a-ii. a description of the impact associated with the risk or opportunity;	a-ii. CDP Climate Change Response TCFD Report 2022 Annual Report: Item 1A. Risk Factors — General Risk, page 23
	a-iii. the financial implications of the risk or opportunity before action is taken;	a-iii. CDP Climate Change Response
	a-iv. the methods used to manage the risk or opportunity;	a-iv. Reducing Environmental Risk Through Credit and Lending Practices CDP Climate Change Response
	a-v. the costs of actions taken to manage the risk or opportunity.	a-v. CDP Climate Change Response
201-3 Defined benefit plan obligations and other retirement plans	a. If the plan's liabilities are met by the organization's general resources, the estimated value of those liabilities.	a. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation — Key Features, pages 55-56 2022 Annual Report: Financial Review and Reports — Critical Accounting Estimates — Pension Plan Accounting, page F-33; Notes to Consolidated Financial Statements — Note 1 – Basis of Presentation and Accounting Policies — Defined Benefit Pension Plan and Other Postretirement Costs, page F-54; Note 17 – Employee Benefit Plans — Defined Benefit Pension and Postretirement Benefit Plans, page F-81-F-86
	d. Percentage of salary contributed by employee or employer.	d. 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation — Key Features, pages 55-56 2022 Annual Report: Financial Review and Reports — Notes to Consolidated Financial Statements — Note 17 – Employee Benefit Plans — Defined Contribution Plans, page F-86
GRI 202: Market Presence 2016	This is not a Comerica GRI Impact Topic.	

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
GRI 203: Indirect Economic Impacts 2016	Our Comerica GRI Impact Topics, ESG Lending & Investment, Financial Inclusion & Financial Literacy, Community Investment & Development, Volunteerism & Philanthropy and Diversity, Equity & Inclusion generally align with the GRI 203 Indirect Economic Impact disclosure.	
203-1 Infrastructure investments and services supported	a. Extent of development of significant infrastructure investments and services supported. b. Current or expected impacts on communities and local economies, including positive and negative impacts where relevant.	a. Community Development Programs b. Community Development Programs
203-2 Significant indirect economic impacts	a. Examples of significant identified indirect economic impacts of the organization, including positive and negative impacts.	a. Small Business Support; Financial Inclusion; Community Development Programs; Small Business Diversity Fund; Attracting Diverse Talent; Supplier Diversity; Amplifying DEI Impact; Community 2023 Proxy Statement: Executive Summary — Volunteerism & Community in 2022, page 7
GRI 204: Procurement Practices 2016	This is not a Comerica GRI Impact Topic.	
204-1 Proportion of spending on local suppliers	a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).	a. 45% of our supply base (by number of suppliers) and 30% of the total spend is located in two of our key markets: Texas and Michigan. We use approximately 1,152 suppliers in Michigan and 916 suppliers in Texas.
GRI 205: Anti-corruption 2016	Our GRI Impact Topics, Anti-Corruption, Ethics and Countering Bribery, Business Risk Management, generally align with GRI 2015 Anti-corruption.	
205-1 Operations assessed for risks related to corruption	b. Significant risks related to corruption identified through the risk assessment.	b. 2022 Annual Report: Item 1A. Risk Factors, page 13
205-2 Communication and training about anti-corruption policies and procedures	e. Total number and percentage of employees that have received training on anticorruption, broken down by employee category and region.	e. Key Metrics — Responsible Business
205-3 Confirmed incidents of corruption and actions taken	a. Total number and nature of confirmed incidents of corruption.	a. Key Metrics — Responsible Business
	b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.	b. Key Metrics — Responsible Business
GRI 206: Anti-competitive Behavior 2016	Our GRI Impact Topic, Anti-Corruption, Ethics & Countering Bribery, generally aligns with GRI 206 Anti-competitive behavior.	
GRI 207: Tax 2019	This is not a Comerica GRI Impact Topic.	
GRI 301: Materials 2016	Our GRI Impact Topic, Environmental Resource Management, generally aligns with GRI 301 Materials.	

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
301-1 Materials used by weight or volume	<p>a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:</p> <p>a-i. non-renewable materials used;</p> <p>a-ii. renewable materials used.</p>	<p>a. Key Metrics — Environment; Reducing Paper, Waste and Water</p> <p>a-i. Key Metrics — Environment</p> <p>a-ii. Key Metrics — Environment</p>
301-2 Recycled input materials used	<p>a. Percentage of recycled input materials used to manufacture the organization's primary products and services.</p>	<p>a. Key Metrics — Environment</p>
GRI 302: Energy 2016	Our GRI Impact Topic, Energy & Emissions, generally aligns with GRI 302 Energy.	
302-1 Energy consumption within the organization	<p>a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.</p> <p>b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.</p> <p>c. In joules, watt-hours or multiples, the total:</p> <p>c-i. electricity consumption</p> <p>c-ii. heating consumption</p> <p>c-iii. cooling consumption</p> <p>c-iv. steam consumption</p> <p>d. In joules, watt-hours or multiples, the total:</p> <p>d-i. electricity sold</p> <p>d-ii. heating sold</p> <p>d-iii. cooling sold</p> <p>d-iv. steam sold</p> <p>e. Total energy consumption within the organization, in joules or multiples.</p> <p>f. Standards, methodologies, assumptions, and/or calculation tools used.</p> <p>g. Source of the conversion factors used.</p>	<p>a. CDP Climate Change Response Key Metrics — Environment</p> <p>b. CDP Climate Change Response</p> <p>c. See breakdown below.</p> <p>c-i. Key Metrics — Environment</p> <p>c-ii. Key Metrics — Environment</p> <p>c-iii. Key Metrics — Environment</p> <p>c-iv. No steam consumption</p> <p>d. See breakdown below.</p> <p>d-i. No electricity sold in 2022</p> <p>d-ii. No heating sold in 2022</p> <p>d-iii. No cooling sold in 2022</p> <p>d-iv. No steam sold in 2022</p> <p>e. CDP Climate Change Response Key Metrics — Environment</p> <p>f. CDP Climate Change Response</p> <p>g. CDP Climate Change Response</p>
302-2 Energy consumption outside of the organization	<p>a. Energy consumption outside of the organization, in joules or multiples.</p>	<p>a. CDP Climate Change Response Key Metrics — Environment</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
302-2 Energy consumption outside of the organization	b. Standards, methodologies, assumptions, and/or calculation tools used.	b. CDP Climate Change Response Key Metrics — Environment
	c. Source of the conversion factors used.	c. CDP Climate Change Response Key Metrics — Environment
302-3 Energy intensity	a. Energy intensity ratio for the organization.	a. Key Metrics — Environment
	b. Organization-specific metric (the denominator) chosen to calculate the ratio.	b. per square foot and per total employee (FTE)
	c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.	c. Energy-related consumption from real estate and transport
	d. Whether the ratio uses energy consumption within the organization, outside of it, or both.	d. Includes energy consumption within the organization
302-4 Reduction of energy consumption	a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.	a. CDP Climate Change Response
	b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.	b. CDP Climate Change Response
	c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.	c. CDP Climate Change Response
	d. Standards, methodologies, assumptions, and/or calculation tools used.	d. CDP Climate Change Response
GRI 303: Water and Effluents 2018	This is not a Comerica GRI Impact Topic.	
303-1 Interactions with water as a shared resource	a. A description of how the organization interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts the organization has caused or contributed to, or that are directly linked to its operations, products, or services by its business relationships (e.g., impacts caused by runoff).	a. Reducing Paper, Waste and Water
	b. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used.	b. CDP Climate Change Response

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
303-3 Water withdrawal	<p>a. Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:</p> <p>a-i. Surface water;</p> <p>a-ii. Groundwater;</p> <p>a-iii. Seawater;</p> <p>a-iv. Produced water;</p> <p>a-v. Third-party water.</p> <p>b. Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:</p> <p>b-i. Surface water;</p> <p>b-ii. Groundwater;</p> <p>b-iii. Seawater;</p> <p>b-iv. Produced water;</p> <p>b-v. Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.</p> <p>c. A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:</p> <p>c-i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);</p> <p>c-ii. Other water ($> 1,000$ mg/L Total Dissolved Solids).</p> <p>d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.</p>	<p>a. to d. Breakdown 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> <p>Key Metrics — Environment</p>
303-5 Water consumption	<p>a. Total water consumption from all areas in megaliters.</p>	<p>a. Key Metrics — Environment</p>
GRI 304: Biodiversity 2016	This is not a Comerica GRI Impact Topic.	
GRI 305: Emissions 2016	Our GRI Impact Topics, Energy & Emissions and Climate Change Impacts, generally align with GRI 305 Emissions.	
305-1 Direct (Scope 1) GHG emissions	<p>a. Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.</p> <p>b. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.</p>	<p>Key Metrics — Environment</p> <p>TCFD Report</p> <p>CDP Climate Change Response</p> <p>b. GHG Emissions Verification</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
305-1 Direct (Scope 1) GHG emissions	d. Base year for the calculation, if applicable, including:	d. TCFD Report CDP Climate Change Response
	d-i. the rationale for choosing it;	d-i. CDP Climate Change Response
	d-ii. emissions in the base year;	d-ii. TCFD Report CDP Climate Change Response
	d-iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	d-iii. No base year recalculations made in 2022.
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	e. CDP Climate Change Response
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	f. We use operational control approach for our greenhouse gas emissions calculations.
	g. Standards, methodologies, assumptions, and/or calculation tools used.	g. CDP Climate Change Response
305-2 Energy indirect (Scope 2) GHG emissions	a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.	a. Key Metrics — Environment CDP Climate Change Response TCFD Report
	b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.	b. CDP Climate Change Response TCFD Report
	c. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF ₆ , NF ₃ , or all.	c. GHG Emissions Verification
	d. Base year for the calculation, if applicable, including:	d. TCFD Report CDP Climate Change Response
	d-i. the rationale for choosing it;	d-i. CDP Climate Change Response
	d-ii. emissions in the base year;	d-ii. TCFD Report CDP Climate Change Response
	d-iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	d-iii. No base year recalculations made in 2022.
e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	e. CDP Climate Change Response	
f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	f. We use operational control approach for our greenhouse gas emissions calculations.	

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
305-2 Energy indirect (Scope 2) GHG emissions	g. Standards, methodologies, assumptions, and/or calculation tools used.	g. CDP Climate Change Response
305-3 Other indirect (Scope 3) GHG emissions	a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent.	a. TCFD Report Key Metrics — Environment CDP Climate Change Response
	b. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	b. GHG Emissions Verification
	d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.	d. Key Metrics — Environment TCFD Report CDP Climate Change Response
	e. Base year for the calculation, if applicable, including:	e. TCFD Report CDP Climate Change Response
	e-i. the rationale for choosing it;	e-i. TCFD Report CDP Climate Change Response
	e-ii. emissions in the base year;	e-ii. TCFD Report CDP Climate Change Response
	e-iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	e-iii. No base year recalculations made in 2022.
	f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	f. TCFD Report (for Financed Emissions) CDP Climate Change Response
g. Standards, methodologies, assumptions, and/or calculation tools used.	g. TCFD Report (for Financed Emissions) CDP Climate Change Response	
305-4 GHG emissions intensity	a. GHG emissions intensity ratio for the organization.	a. CDP Climate Change Response (for total Scope 1 and 2 Emissions) TCFD Report (for Financed Emissions)
	b. Organization-specific metric (the denominator) chosen to calculate the ratio.	b. By square foot, full-time equivalent (FTE) and gross revenues (for total Scope 1 and 2 emissions) By \$ in millions loans outstanding (for Financed Emissions)
	c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).	c. CDP Climate Change Response (for total Scope 1 and 2 Emissions) TCFD Report (for Financed Emissions)
	d. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	d. GHG Emissions Verification

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
305-5 Reduction of GHG emissions	a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO2 equivalent.	<p>a. Reducing GHG Emissions</p> <p>CDP Climate Change Response (for total Scope 1 and 2 Emissions)</p> <p>TCFD Report (for total Scope 1 and 2 Emissions)</p> <p>2023 Proxy Statement: Executive Summary — Sustainability in 2022, page 5</p> <p>2022 Annual Report, page 3 of PDF</p>
	c. Base year or baseline, including the rationale for choosing it.	<p>c. CDP Climate Change Response (for total Scope 1 and 2 Emissions)</p> <p>TCFD Report (for Financed Emissions)</p>
	d. Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).	<p>d. CDP Climate Change Response (for total Scope 1 and 2 Emissions)</p> <p>TCFD Report (for Financed Emissions and some other Scope 3 categories)</p>
	e. Standards, methodologies, assumptions, and/or calculation tools used.	<p>e. CDP Climate Change Response</p>
GRI 306: Waste 2020	Our GRI Impact Topic, Environmental Resource Management, generally aligns with GRI 306 Waste.	
306-1 Waste generation and significant waste-related impacts	a. For the organization's significant actual and potential waste-related impacts, a description of:	See breakdown below.
	a-i. the inputs, activities, and outputs that lead or could lead to these impacts;	a-i. Reducing Paper, Waste and Water Impacts Key Metrics — Environment
	a-ii. whether these impacts relate to waste generated in the organization's own activities or to waste generated upstream or downstream in its value chain.	a-ii. Reducing Paper, Waste and Water Impacts
306-2 Management of significant waste-related impacts	a. Actions, including circularity measures, taken to prevent waste generation in the organization's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated.	a. Reducing Paper, Waste and Water Impacts Comerica Shred Days Support Privacy, Recycling and Food Banks
	b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations.	b. Reducing Paper, Waste and Water Impacts
	c. The processes used to collect and monitor waste-related data.	c. Reducing Paper, Waste and Water Impacts
306-3 Waste generated	a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.	a. Reducing Paper, Waste and Water Impacts Key Metrics — Environment
	b. Contextual information necessary to understand the data and how the data has been compiled.	b. Reducing Paper, Waste and Water Impacts Key Metrics — Environment
306-4 Waste diverted from disposal	a. Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste.	a. Reducing Paper, Waste and Water Impacts Key Metrics — Environment

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
306-4 Waste diverted from disposal	c. Total weight of non-hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:	c. Key Metrics — Environment
	c-i. Preparation for reuse;	c-i. Key Metrics — Environment
	c-ii. Recycling;	c-ii. Key Metrics — Environment
	c-iii. Other recovery operations.	c-iii. Key Metrics — Environment
	d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal:	See breakdown below.
306-5 Waste directed to disposal	d-ii. offsite.	d-ii. Key Metrics — Environment
	a. Total weight of waste directed to disposal in metric tons, and a breakdown of this total by composition of the waste.	a. Key Metrics — Environment
	c. Total weight of non-hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:	c. Key Metrics — Environment
	c-iii. Landfilling;	c-iii. Key Metrics — Environment
	d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal:	See breakdown below.
d-ii. offsite.	d-ii. Key Metrics — Environment	
GRI 308: Supplier Environmental Assessment 2016	This is not a Comerica GRI Impact Topic.	
308-1 New suppliers that were screened using environmental criteria	a. Percentage of new suppliers that were screened using environmental criteria.	a. Driving Sustainability Engagement and Awareness
308-2 Negative environmental impacts in the supply chain and actions taken	a. Number of suppliers assessed for environmental impacts.	a. Driving Sustainability Engagement and Awareness CDP Climate Change Response
GRI 401: Employment 2016	Our GRI Impact Topic, Talent Attraction, Development & Retention, generally aligns with GRI 401 Employment.	
401-1 New employee hires and employee turnover	a. Total number and rate of new employee hires during the reporting period, by age group, gender and region.	a. Talent Attraction Key Metrics — Colleagues
	b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.	b. Key Metrics — Colleagues 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum:	a. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation, pages 54-56 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	a-i. life insurance;	a-i. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation, pages 54-56
	a-ii. health care;	a-ii. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation, pages 54-56 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13
	a-iii. disability and invalidity coverage;	a-iii. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation, pages 54-56
	a-iv. parental leave;	a-iv. Compensation and Benefits
	a-v. retirement provision;	a-v. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation — Retirement Benefits, page 55 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13
	a-vi. stock ownership;	a-vi. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation — Employee Stock Purchase Plan, page 55 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13
	a-vii. others.	a-vii. Compensation and Benefits 2023 Proxy Statement: Proposal 3: Approval of a Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2022 Pay Actions — Other Benefits Programs and Compensation, pages 54-56 2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13
401-3 Parental leave	a. Total number of employees that were entitled to parental leave, by gender.	a. Compensation and Benefits (footnote #6)
GRI 402: Labor/Management Relations 2016	Our GRI Impact Topic, Employee Engagement, generally aligns with GRI 402 Labor/Management Relations.	
402-1 Minimum notice periods regarding operational changes	a. Minimum number of weeks' notice typically provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them.	a. 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 STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
402-1 Minimum notice periods regarding operational changes	b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.	b. Comerica did not have any employees under collective bargaining agreements in 2022.
GRI 403: Occupational Health and Safety 2018		
Our GRI Impact Topic, Health, Safety & Well-Being, generally aligns with GRI 403 Occupational Health and Safety		
403-6 Promotion of worker health	<p>a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided.</p> <p>b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.</p>	<p>a. Compensation and Benefits</p> <p>b. Compensation and Benefits</p>
GRI 404: Training and Education 2016		
Our GRI Impact Topic, Talent Attraction, Retention & Development, generally aligns with GRI 404 Training and Education.		
404-1 Average hours of training per year per employee	a. Average hours of training that the organization's employees have undertaken during the reporting period, by:	a. Key Metrics — Colleagues 2022 Annual Report Item 1. Business — Human Capital Resources, pages 11-13
404-2 Programs for upgrading employee skills and transition assistance programs	a. Type and scope of programs implemented and assistance provided to upgrade employee skills.	<p>a. Learning and Development</p> <p>DEI — Educating Our Colleagues</p> <p>Driving Sustainability Engagement and Awareness</p> <p>Community Reinvestment Act (CRA)</p> <p>2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13</p>
GRI 405: Diversity and Equal Opportunity 2016		
Our Impact Topic, Diversity, Equity & Inclusion, generally aligns with GRI 405 Diversity and Equal Opportunity. 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.		
405-1 Diversity of governance bodies and employees	<p>a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:</p> <p>a-i. Gender;</p> <p>a-ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</p>	<p>See breakdowns below.</p> <p>a-i. Workforce and Board Diversity</p> <p>Key Metrics — Diversity, Equity and Inclusion</p> <p>2023 Proxy Statement: Executive Summary — Employee Diversity, Inclusion and Engagement in 2022, page 6; Executive Summary — Director Qualifications, Experience and Demographics, pages 9-10</p> <p>2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13</p> <p>Employer Information Report EEO-1</p> <p>a-ii. Workforce and Board Diversity</p> <p>Key Metrics — Diversity, Equity and Inclusion (Board)</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
405-1 Diversity of governance bodies and employees	a-iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).	<p>a-iii. Workforce and Board Diversity</p> <p>Key Metrics — Diversity, Equity and Inclusion (Board)</p> <p>2023 Proxy Statement: Executive Summary — Employee Diversity, Inclusion and Engagement in 2022, page 6; Executive Summary — Director Qualifications, Experience and Demographics, pages 9-10</p> <p>2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13</p> <p>Employer Information Report EEO-1</p>
	b. Percentage of employees per employee category in each of the following diversity categories:	b. See breakdowns below.
	b-i. Gender;	<p>b-i. About Comerica</p> <p>Workforce and Board Diversity</p> <p>Key Metrics — Colleagues</p> <p>Key Metrics — Diversity, Equity and Inclusion</p> <p>2023 Proxy Statement: Executive Summary — Employee Diversity, Inclusion and Engagement in 2022, page 6</p> <p>2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13</p> <p>Employer Information Report EEO-1</p>
	b-ii. Age group: under 30 years old, 30-50 years old, over 50 years old;	b-ii. Key Metrics — Colleagues
	b-iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).	<p>b-iii. About Comerica</p> <p>Workforce and Board Diversity</p> <p>Key Metrics — Colleagues</p> <p>Key Metrics — Diversity, Equity and Inclusion</p> <p>2023 Proxy Statement: Executive Summary — Employee Diversity, Inclusion and Engagement in 2022, page 6</p> <p>2022 Annual Report: Item 1. Business — Human Capital Resources, pages 11-13</p> <p>Employer Information Report EEO-1</p>
GRI 406: Non-discrimination 2016	Our Impact Topic, Diversity, Equity & Inclusion, generally aligns with GRI 406: Non-discrimination	
GRI 407: Freedom of Association and Collective Bargaining 2016	This is not a Comerica GRI Impact Topic.	
GRI 408: Child Labor 2016	This is not a Comerica GRI Impact Topic.	
GRI 409: Forced or Compulsory Labor 2016	This is not a Comerica GRI Impact Topic.	
GRI 410: Security Practices 2016	This is not a Comerica GRI Impact Topic.	
GRI 411: Rights of Indigenous Peoples 2016	This is not a Comerica GRI Impact Topic.	

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
GRI 413: Local Communities 2016	Our GRI Impact Topics, Community Investment & Development; Volunteerism & Philanthropy, Financial Inclusion & Financial Education, generally align with GRI 413 Local Communities.	
413-1 Operations with local community engagement, impact assessments, and development programs	a-iv. local community development programs based on local communities' needs;	<p>a-iv. Small Business Support</p> <p>Financial Inclusion</p> <p>Community Development Programs</p> <p>ESG-Related Lending and Investment</p> <p>Small Business Diversity Fund</p> <p>Recruiting Networks</p> <p>National Business League Partnership</p> <p>Amplifying our DEI Impact</p> <p>Empowering and Strengthening our Communities</p> <p>Financial Education</p> <p>Business Resource Groups</p> <p>Volunteerism and Philanthropy</p> <p>Comerica Shred Days Support Privacy, Recycling and Food Banks</p> <p>2023 Proxy Statement: Executive Summary — Volunteerism & Community in 2022, page 7</p> <p>2022 Annual Report, page 3 of PDF</p>
GRI 414: Supplier Social Assessment 2016	This is not a Comerica GRI Impact Topic.	
GRI 415: Public Policy 2016	Our GRI Impact Topic, Public Policy & Government Relations, generally aligns with GRI 415 Public Policy.	
415-1 Political contributions	a. Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.	<p>a. Public Policy and Government Relations</p> <p>Key Metrics — Responsible Business</p> <p>PAC Contributions</p>
GRI 416: Customer Health and Safety 2016	This is not a Comerica GRI Impact Topic.	
GRI 417: Marketing and Labeling 2016	This is not a Comerica GRI Impact Topic.	

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
417-2 Incidents of non-compliance concerning product and service information and labeling	<p>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labeling, by:</p> <p>a-i. incidents of non-compliance with regulations resulting in a fine or penalty;</p> <p>a-ii. incidents of non-compliance with regulations resulting in a warning;</p> <p>a-iii. incidents of non-compliance with voluntary codes.</p> <p>b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.</p>	a. to b. There were no significant fines in 2022 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.
417-3 Incidents of non-compliance concerning marketing communications	<p>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by:</p> <p>a-i. incidents of non-compliance with regulations resulting in a fine or penalty;</p> <p>a-ii. incidents of non-compliance with regulations resulting in a warning;</p> <p>a-iii. incidents of non-compliance with voluntary codes.</p> <p>b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.</p>	a. to b. There were no significant fines in 2022 for non-compliance with laws and regulations concerning marketing communications that would have a material adverse effect on our operations or ability to perform the services we offer.
GRI 418: Customer Privacy 2016	Our GRI Impact Topic, Privacy and Information Protection, generally aligns with GRI 418 Customer Privacy.	
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:</p> <p>b. Total number of identified leaks, thefts, or losses of customer data.</p>	<p>a. Key Metrics — Responsible Business</p> <p>b. Key Metrics — Responsible Business</p>
Comerica Impact Topic: Innovation & Technology	Our Impact Topic, Innovation & Technology, does not align with a specific GRI disclosure	
3-3 Management of material topics	<p>d. Describe actions taken to manage the topic and related impacts, including:</p> <p>d-i. actions to prevent or mitigate potential negative impacts;</p> <p>d-iii. actions to manage actual and potential positive impacts;</p> <p>e. Report the following information about tracking the effectiveness of the actions taken:</p> <p>e-i. processes used to track the effectiveness of the actions;</p>	<p>d. Innovation and Technology</p> <p>d-i. Innovation and Technology</p> <p>d-iii. Innovation and Technology</p> <p>See breakdown below.</p> <p>e-i. Innovation and Technology</p>

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
3-3 Management of material topics	e-ii. goals, targets, and indicators used to evaluate progress;	e-ii. Innovation and Technology Key Metrics — Customers
	e-iii. the effectiveness of the actions, including progress toward the goals and targets;	e-iii. Key Metrics — Customers
	f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).	f. Innovation and Technology
N/A	Percent changes in technology solution uses	Innovation and Technology Key Metrics — Customers
Comerica Impact Topic: Reputation	Our Impact Topic, Reputation, does not align with a specific GRI disclosure.	
3-3 Management of material topics	a. Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;	a. Comerica CDP Response Human Rights 2022 Annual Report: Item 1A. Risk Factors. Technology Risk (pages 16-17), Operational Risk (pages 17-19), Strategic Risk (pages 20-21) and General Risk (pages 22-24)
	d. Describe actions taken to manage the topic and related impacts, including:	d. 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. Our leadership team actively oversees potential risks to our reputation, and our 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.
	e. Report the following information about tracking the effectiveness of the actions taken:	e. Through our processes to identify and assess reputational impacts, we proactively manage a wide variety of business operations that affect our reputation. We view positive ratings, rankings and awards as verification of our approach to reputation management. 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.
N/A	Corporate Responsibility Awards/Recognition in the reporting year	About Comerica
Comerica Impact Topic: Transparency	Our Impact Topic, Transparency, does not align with a specific GRI disclosure.	
3-3 Management of material topics	a. Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;	a. Responsible Business

GRI STANDARD DISCLOSURE	REQUIREMENTS	LOCATION
3-3 Management of material topics	d. Describe actions taken to manage the topic and related impacts, including:	d. 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) .
	e. Report the following information about tracking the effectiveness of the actions taken:	<p>Responsible Business</p> <p>e. Comerica provides extensive information on our website Comerica Investors - Investor Overview, including investor presentations, annual and quarterly reports, our proxy statements and news releases. Our compliance with disclosure obligations demonstrates our approach to Transparency.</p>
N/A	Number of years that Comerica has published an annual sustainability and/or corporate-responsibility themed report	Responsible Business

SASB Standards Content Index

This is a supplement to the 2022 Comerica Corporate Responsibility Report. Please review the Corporate Responsibility Report in its entirety for more details.

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 (Responsible Business)	Metrics (2) and (3) not provided.
	FN-CB-230a.2	Description of approach to identifying and addressing data security risks	Yes	Enterprise Security Privacy and Data Protection Security Commitment Biometric Data Policy	—
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	Yes	Empowering and Strengthening Our Communities Fair and Responsible Banking Key Metrics (Customers) Key Metrics (Community)	—
	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	2022 Annual Report (page F-19)	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) Financial Inclusion	—
	FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Yes	Key Metrics (Community) Financial Education	—
Incorporation of ESG Factors in Credit Analysis	FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Yes	Reducing Environmental Risk through Credit and Lending Practices TCFD Report	—

SASB FINANCIALS SECTOR COMMERCIAL BANKING STANDARD DISCLOSURES

SASB TOPIC	SASB CODE	ACCOUNTING METRIC	DISCLOSURE MET?	LINK OR DIRECT RESPONSE	COMMENTS
Financed Emissions	FN-CB-410b.1	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	Yes	TCFD Report	Absolute financed emissions provided for Scope 1&2 (combined) and Scope 3
	FN-CB-410b.2	Gross exposure for each industry by asset class	Partially	TCFD Report	Absolute emissions estimate based on loans outstanding (net book balance as proxy), not gross exposure
	FN-CB-410b.3	Percentage of gross exposure included in the financed emissions calculation	Partially	TCFD Report	Absolute emissions estimate based on loans outstanding (net book balance as proxy), not gross exposure
	FN-CB-410b.4	Description of the methodology used to calculate financed emissions	Yes	TCFD Report	
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	2022 Annual Report (page F-90)	All legal proceeding expenses declared in Note 21
	FN-CB-510a.2 FN-AC-510a.2	Description of whistleblower policies and procedures	Yes	Reporting and No Retaliation Policy	—
Systemic Risk Management	FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Yes	See Comments.	Comerica is not a G-SIB.
	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	Partially	Business Risk Management; 2022 Annual Report (pages 2-3, 19, F-24) 2023 TCFD Report Most Recent CDP Response	—
Activity Metrics	FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Yes	2022 Annual Report (page F-4); Key Metrics (Community)	(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	Yes	2022 Annual Report (pages F-4, F-11, F-12) Small Business Support Key Metrics (Customers) Key Metrics (Community)	—



Comerica Bank: MEMBER FDIC.
EQUAL OPPORTUNITY LENDER.
EQUAL HOUSING LENDER NMLS ID 480990.

Comerica: EQUAL OPPORTUNITY EMPLOYER

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