

2024

Corporate Responsibility Report

A Force for Good

A comprehensive review of Comerica's responsible
business practices and progress



The disclosures included in this document are being provided to the public in an effort to provide transparency into our environmental, social and governance (ESG) initiatives, to respond to stakeholder requests, and to further enhance our stakeholders' understanding of corporate responsibility practices at Comerica. This report is provided for informational purposes only and is not intended as advertising, or marketing material, or as an offer or recommendation to purchase any asset, product or service. Our approaches to the disclosures included in this document differ in significant ways from those included in mandatory regulatory reporting, including under U.S. Securities and Exchange Commission rules and regulations and applicable stock exchange listings, and may consider different and broader definitions of materiality promulgated by other frameworks and reporting guidelines that take into consideration a wider range of factors. Thus, while certain matters discussed in this document may be significant, any significance should not be read as necessarily rising to the level of materiality used for the purposes of complying with the U.S. federal securities laws, or any other regulatory purpose. Information and metrics in these disclosures are unaudited, reliant on methodologies which continue to evolve, and cite third-party information that we do not independently verify. For example, standards for accounting for and measuring impact and greenhouse gas (GHG) emissions, as well as measuring GHG emissions reductions, vary, including due to the underlying emissions factors, assumptions or other methodological features. Any changes to methodologies or the information we have cited may change our disclosures.

This document contains forward-looking statements within the meaning of the safe harbor provisions of the U.S. Private Securities Litigation Reform Act of 1995. Forward-looking statements can be identified by words such as "achieve," "anticipate," "assume," "believe," "could," "deliver," "drive," "enhance," "estimate," "expect," "focus," "future," "goal," "grow," "guidance," "intend," "may," "might," "plan," "position," "opportunity," "outlook," "strategy," "target," "trajectory," "trend," "will," "would," and similar expressions or the negative of such terms or other comparable terminology. Forward-looking statements include, but are not limited to, statements about our business and corporate responsibility strategy, goals, commitments, aspirations and objectives, such as our emissions reduction targets, community investment and philanthropic goals, customer initiatives and talent strategy, which may evolve over time. These statements are not historical facts, but instead represent our beliefs regarding future events, many of which, by their nature, are inherently uncertain and outside of our control. Our actual outcomes and results may differ materially from those indicated in these forward-looking statements. Important factors that could cause our actual outcomes and results to differ materially from those indicated in such forward-looking statements include: our ability to successfully implement business and corporate responsibility-related initiatives under expected time frames; our ability to retain and attract qualified employees in a competitive environment for talent; global sociodemographic and economic trends; climate-related conditions and weather events; macroeconomic factors, such as changes in general economic conditions and monetary and fiscal policy; technological innovations and scientific developments; the quality and availability of relevant third-party data; legislative and regulatory changes; changes in customer behavior; declines in the businesses or industries of our customers; the outcomes of legal and regulatory proceedings and related financial services industry matters; competitive product and pricing pressures; and the other factors set forth in "Item 1A. Risk Factors" beginning on page 16 of our Annual Report on Form 10-K for the year ended December 31, 2024. Any forward-looking statement made by us in this document is based solely on information currently available to us and speaks only as of the date on which it is made. We undertake no obligation to publicly update any forward-looking statement, whether written or oral, that may be made from time to time, whether as a result of new information, future developments or otherwise, except to the extent required by law.

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Message from Our Chairman, President and CEO



Comerica is pleased to share our 17th annual Corporate Responsibility Report, which includes a summary of Comerica's progress on key sustainability, social and governance issues.

“Comerica continues to define how we innovate and shape our future to deliver the highest value for all of our stakeholders. To do so, we remain focused on continued growth, the customer experience and a strong company culture.”



In 2024, Comerica celebrated a remarkable milestone — 175 years of excellence and dedication to our customers, communities and sustainable growth. While the banking industry, business landscape and global environment have become increasingly more complex since our humble beginnings, the cornerstone of our success has proven tried and true: maintain a relationship-based approach to banking to fulfill the needs of our customers, colleagues and communities.

Over the years, we have grown, adapted and innovated to meet evolving needs of the world around us. We have seen economic changes, embraced new technologies and continued our investment in our colleagues and our communities. Throughout this report, you will find examples of Comerica's commitment to our [Core Values](#). These Core Values reinforce the mission behind our work and the efforts our colleagues make to deliver above and beyond traditional banking services. Our Corporate Responsibility Platform provides the framework that addresses the critical issues of financial education, corporate citizenship, access to capital, and products and services that support environmental and social needs.

Comerica continues to refine how we innovate and shape our future to deliver the highest value to all of our stakeholders. To do so, we remain focused on continued growth, the customer experience and a strong company culture. We take this responsibility to heart and are committed to fulfilling this critical work with integrity and excellence.

Thank you to all of our stakeholders for your contributions, which enable Comerica to be “A Force for Good” in our communities. We look forward to serving you for another 175 years.

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

About This Report

From responsible business decisions and colleague engagement to risk management and innovation, corporate responsibility is central to how we operate at Comerica. This 17th annual Corporate Responsibility Report showcases our deep commitment to driving progress in these areas. It is our goal to continue to move forward ensuring that our company, colleagues, customers, communities and other stakeholders thrive, now and long into the future.

Our reporting generally aligns with the following frameworks:

GRI (Global Reporting Initiative)	Overall reporting structure and approach to disclosing the topics most significant to Comerica and our stakeholders.
SASB (Sustainability Accounting Standards Board)	Highlighting corporate responsibility topics for the commercial banking sector.
TCFD (Task Force on Climate-Related Financial Disclosures)	Illustrating Comerica's approach to the strategy, governance, risk management, metrics and targets for climate-related matters.
CDP	Providing disclosure of greenhouse gas (GHG) emissions and related approaches to climate risks and opportunities.
UN SDGs (Sustainable Development Goals)	Allows for alignment with global goals as our call to action to help end poverty and inequality, protect the planet and ensure health, justice and prosperity for all.

The information and scope of performance data in this report is company-wide for the fiscal year ending December 31, 2024, and all financial information is presented in U.S. dollars, unless otherwise noted.

While this Corporate Responsibility Report has not been externally assured, we annually assure our Scope 1, 2 and 3 GHG emissions using ISO 14064-3 (limited assurance, [GHG emissions assurance letter for 2024 emissions](#)). Additional GHG emissions assurance details are provided in our [most recent CDP Response](#).

The [Reporting Methodology](#) section of this report contains additional details regarding the frameworks we use and our approach to corporate responsibility reporting. We also include GRI and SASB content indices that are in the [Additional Information](#) section of this report.

For additional information on corporate responsibility activities and disclosures, see:



2025 Proxy Statement



2024 Annual Report



2024 CDP Response



2023 Corporate Responsibility Report

In this report and in Comerica's prior corporate responsibility reports, we use the term "impact" to refer to topics that reflect responsible business practices most important to Comerica and our stakeholders — what the GRI Sustainability Reporting Standards refer to 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.

About Comerica



Our Company

Founded in 1849, Comerica (NYSE: CMA) is a financial services company headquartered in Dallas, Texas. While a lot has changed over the past 175 years, one thing remains the same — our commitment to serving the financial needs of our customers and communities.

Comerica is one of the 25 largest commercial U.S. financial holding companies and focuses on building relationships and helping people and businesses be successful. We are strategically aligned by three business segments: The Commercial Bank, The Retail Bank and Wealth Management. Comerica provided 380 U.S. banking centers as of December 31, 2024, with locations in Arizona, California, Florida, Michigan and Texas. Founded 175 years ago in Detroit, Michigan, Comerica continues to expand into new regions, including its Southeast Market, based in North Carolina, and Mountain West Market in Colorado. Learn more about how Comerica is raising expectations of what a bank can be by visiting [comerica.com](https://www.comerica.com) and following us on [Facebook](#), [X](#), [Instagram](#) and [LinkedIn](#).

Creating Power and Stability Through Responsible Banking Practices

Award-winning relationship banking	With expertise spanning a number of different industries and markets, our bankers have the knowledge and skills needed to refine solutions tailored to meet the needs of those we serve.
Strong credit fundamentals	We have consistent, conservative underwriting standards and balanced exposure to a wide variety of industries across multiple markets, helping to minimize the impact of economic downturns.
Providing the best of both worlds	As a regional bank, Comerica occupies a unique niche in the banking industry, combining a number of “big bank” products and services with a more localized and personalized touch reminiscent of community banks.
The right markets and right model	Comerica offers its financial services and expertise in some of the fastest-growing and most vibrant regions in America. We have offices in 17 states and serve 14 of the 15 largest U.S. metropolitan areas, as well as Canada and Mexico.

Our Core Values

Comerica’s Core Values represent how we connect with our colleagues, customers and other stakeholders. Based on concepts that are simple, memorable, inspirational and actionable, our Core Values reinforce our culture in a way that resonates.

Why We Are Here

To raise expectations of what a bank can be for our colleagues, customers and communities

What We Believe



One Comerica

We believe that growth is achieved when our colleagues act with common purpose in support of shared goals.



The Customer Comes First

We put our customers at the center of every conversation and make their satisfaction our highest priority.



The Bigger Possible

We encourage a culture of bold and relentless curiosity, where any idea has a chance to be heard.



A Force for Good

We value empathy and integrity as we work to create a more inclusive and sustainable workplace and world.

How We Deliver



Trust. Act. Own.

Trust.

Everyone is empowered to do what’s best for both our customers and colleagues.

Act.

Speak up, be heard and make things happen when you see a chance to improve our culture and the customer experience.

Own.

Be accountable for your actions and always follow through on your commitments.

Our Promise

We will Raise Your Expectations[®] of what a bank can be.

This promise guides our interactions with customers and reflects our deep, unwavering commitment to providing them with the service, knowledge and positive experience that meets their desires and exceeds their expectations.

Our strategically aligned business segments are set up to help ensure that individuals and businesses are successful:



The Commercial Bank

Provides companies with an array of credit and non-credit financial products and services.



The Retail Bank

Delivers personalized financial products and services to consumers and small businesses.



Wealth Management

Serves the needs of high-net-worth clients and institutions.

2024 Corporate Responsibility Recognition

Ranked among Newsweek's listings of America's Most Responsible Companies for the sixth consecutive year and America's Greenest Companies for second consecutive year	Named to the list of America's Most JUST Companies for the second consecutive year	Recognized by Crisil Coalition Greenwich in 2025 as Best Bank for its dedication to supporting small business and middle market clients	2024 American Bankers Association Foundation Community Commitment Award related to the BusinessHQ™ program	2024 Top Workplaces USA award issued by Energage and published by USA Today	Named one of The Civic 50's Most Community Minded Companies for the ninth consecutive year
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2024 Financial Highlights

As we celebrated our 175th anniversary, 2024 was a year of strength as we positioned ourselves for long-term success and saw promising customer trends. We maintained strong credit quality and continued to advance strategic priorities, such as investing in sales colleagues and modernizing our technology and real estate footprint. Through our support of financial education, economic development and human services programming, we worked on positively impacting our local communities. Small business remained a key focus as we added talent to expand our sales coverage and continued to provide critical business resources to support this important sector.

We enhanced our liquidity position, growing customer deposits while deliberately reducing brokered time deposits by \$3.5 billion and short-term borrowings by \$3.6 billion year-over-year. We produced average loans of \$51.0 billion and return on average common shareholders' equity of 11.23%, return on average assets of 0.87% and diluted earnings per share of \$5.02. Our proven approach to credit and underwriting resulted in historically low net charge-offs as a percentage of average total loans of 0.10%.

\$3.2

billion in revenue

380

U.S. banking centers

\$79.3

billion in assets

175

years in operation

7,565

full-time colleagues

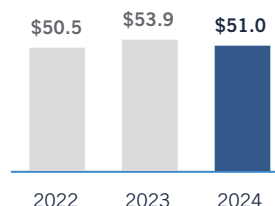
363

part-time colleagues

You can find additional information in the [Comerica 2024 Annual Report](#) or [2025 Proxy Statement](#).

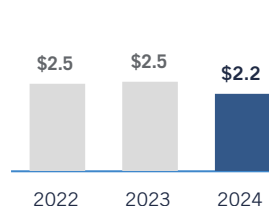
\$51.0B

Loans
(\$ in billions; avg.)



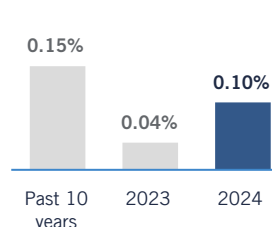
\$2.2B

Net Interest Income
(\$ in billions)

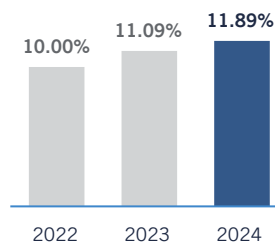


0.10%

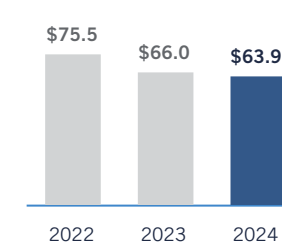
% of Average Total Loans; YTD



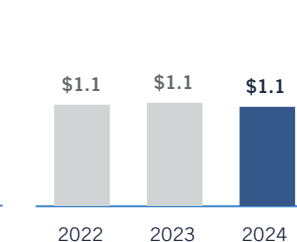
Continued Strong Capital
(Common Equity Tier 1)



Total Deposits
(\$ in billions; avg.)



Noninterest Income
(\$ in billions)



“At Comerica, we recognize the vital role financial institutions play in our local economies and beyond. As a good corporate citizen, it is our responsibility to help build healthy, strong communities. We take this responsibility very seriously and are committed to fulfilling this critical work with integrity and excellence.”

Curtis C. Farmer

Chairman, President and Chief Executive Officer

Corporate Responsibility at Comerica

“Our commitment to sustainable practices is not only central to our Company’s values but also vital to our long-term success. In a rapidly changing world, we recognize our responsibilities extend beyond financial performance. We must also commit to being good stewards of our resources, supporting our communities and championing ethical governance.”

Wendy Bridges
Executive Vice President,
Executive Director of Corporate Affairs



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Corporate Responsibility at Comerica

At Comerica, traits such as honesty, transparency and fairness have enabled our company to be a “Force for Good” throughout our long history. Along with our Core Values, corporate responsibility is a cornerstone of the company and informs how we do business on a daily basis. This Force for Good mentality drives positive change and long-term sustainable value for our company, stakeholders and communities.

Our Corporate Responsibility Approach

Comerica supports the ideals of corporate responsibility and has published an annual report on our corporate responsibility progress since 2008.

Since 2021, many of our corporate responsibility-related departments have operated under the unified leadership structure of a Corporate Affairs Division.

Reporting directly to Comerica’s Chairman, President and Chief Executive Officer, the Chief Administrative Officer connects the Corporate Affairs functions of sustainability, community, corporate philanthropy, community reinvestment, quality, corporate communications and government relations, with Human Resources and employee relations.

Comerica’s Environmental, Social and Governance Committee, established in 2020, drives long-term value by establishing a cohesive, strategic direction to raise expectations of Comerica’s corporate responsibility programs and performance. We continue to work toward leadership among our peers and our industry, as these results positively impact our stakeholders, including our customers, colleagues and communities.

Our Corporate Responsibility Platform

Comerica’s Corporate Responsibility Platform highlights five key commitments to corporate responsibility, supported by our history of strong governance practices and emphasis on promoting transparency.



Capital Access

Provide access to capital focused on underserved and underrepresented communities and small businesses.



Climate

Address climate change by reducing our GHG emissions, managing climate risks and supporting our customers.



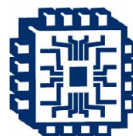
Inclusion

Value the perspectives of all colleagues and outreach to diverse organizations to promote careers in the financial services industry.



Financial Education

Invest in financial education for underserved communities.



Responsible Technology

Utilize, design, develop and deploy innovative and efficient digital systems while upholding ethics, transparency and security.

Impact and Stakeholder Engagement

Our Impact Assessment Process

Since releasing our inaugural sustainability report in 2008, we have continued to refine and refresh our “Impact Topics,” those matters most significant to Comerica and our stakeholders. These Impact Topics focus our corporate responsibility efforts on issues most important to our company and stakeholders and guide our corporate responsibility reporting. We deliberately refer to them as Impact Topics to avoid any potential confusion with the term “material” or “materiality” under U.S. securities law.

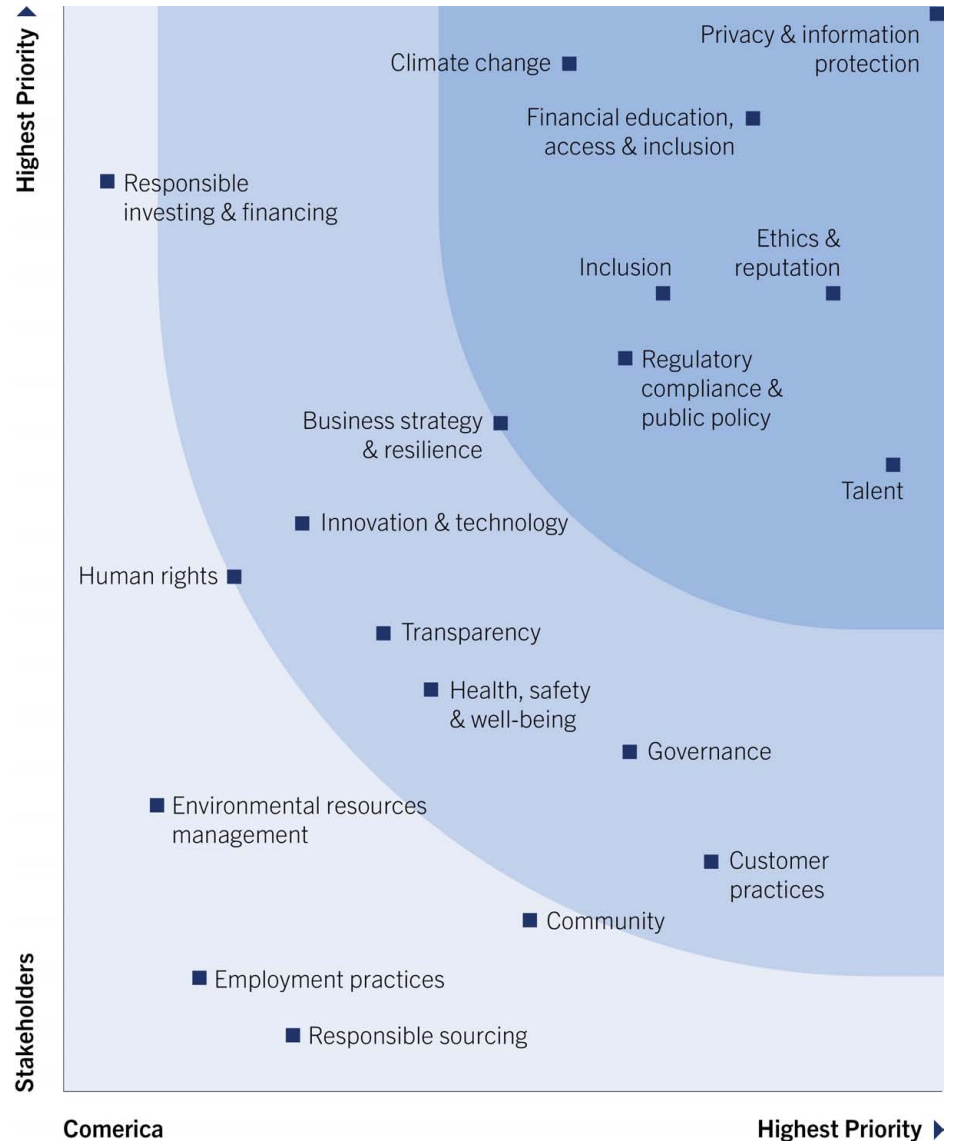
Our impact assessment process takes a variety of stakeholders’ formal and informal perspectives from a mixture of entities, including investors, colleagues, customers, ESG-related non-governmental organizations (NGOs), ESG ratings organizations, media, suppliers, peers and others. Through interviews, surveys, meetings, benchmarking and research, we identified the topics of greatest importance to our business and stakeholders.

At Comerica, we view our corporate responsibility initiatives as a continuous improvement journey. We also recognize that stakeholder views and priorities, as well as global challenges, can change over time. We periodically review and update our impact assessment to help ensure that our corporate responsibility strategy and efforts remain current. We continue to use Datamaran’s software platform to augment traditional stakeholder feedback and inform our Impact Topics.

In 2024 and into early 2025, Comerica refreshed our analysis of our Impact Topics using Datamaran and feedback from executive leaders and senior managers. The Datamaran software platform helps ensure that we are considering a broad set of potential corporate responsibility-related information relevant to our business. Through the use of natural language processing, combined with advanced data analytics, the software allows for more dynamic monitoring of the evolving corporate responsibility landscape. This gives Comerica the perspectives of a far larger group of stakeholders and grounds our work in a more robust, evidence-based approach to corporate responsibility topics.

The results of this analysis helped guide our reporting and programmatic efforts around the corresponding Impact Topics. Because all of our impact topics are significant priorities for Comerica and our stakeholders, we have accordingly classified our priorities ranging from high to highest.

Impact Topic Priority



Impact Topics Mapped to Report Sections

Impact Topics	Report Section(s)
Climate Change	Environment
Inclusion	Inclusion
Ethics & Reputation	Responsible Business
Financial Education, Access & Inclusion	Community, Customers
Privacy & Information Protection	Responsible Business
Regulatory Compliance & Public Policy	Responsible Business
Talent	Colleagues
Business Strategy & Resilience	About Comerica, Corporate Responsibility at Comerica
Community	Community
Customer Practices	Customers
Governance	Responsible Business
Health, Safety & Well-Being	Colleagues
Transparency	Responsible Business, Corporate Responsibility at Comerica
Employment Practices	Colleagues
Environmental Resources Management	Environment
Human Rights	Responsible Business
Innovation & Technology	Customers
Responsible Investing & Financing	Community, Environment
Responsible Sourcing	Inclusion

We recognize that not only do the identified topics impact Comerica, but they can in turn also greatly impact others. This “double materiality” concept has been inherently included in how we think about all of our Impact Topics. We have begun looking at ways to assess double materiality and have conducted preliminary assessments. As double materiality becomes more explicitly ingrained in corporate responsibility reporting, we expect to increase our efforts to formally share our analysis of “outside-in” and “inside-out” impacts in the future.



Stakeholder Engagement

We regularly engage with a broad cross-section of diverse stakeholders on corporate responsibility issues to inform our strategy. Through meetings, surveys, conferences, online communities, events, updates and other outreach activities, we help ensure prioritization of the key corporate responsibility topics most important to our stakeholders.

Stakeholder Group	Methods of Engagement	Priority Topics
Colleagues	Intranet communications, impact teams, green teams, individual meetings, One Comerica meetings	Strategy, communications, performance vs. goals, innovation, serving customer needs
Customers	Individual meetings, surveys, online communities, customer appreciation events	Financial education and knowledge-sharing on broad variety of topics, partnering with community organizations, cybersecurity
ESG-Related Non-Governmental Organizations (NGOs)	Individual meetings, surveys, professional organizations	Improved banking access, financial education, customer engagement strategies on corporate responsibility issues, transparency in policies and communications
ESG Rating and Ranking Organizations	Individual meetings, surveys, professional organizations	Engaging the value chain, moving from disclosure to action, focusing on inclusion, climate change, impact investing, responsible lending, investor communication on corporate responsibility, board diversity
Impact Investors	Individual meetings, investor conferences/presentations, quarterly earnings calls	Transparency, stranded assets, climate change issues
Industry	Industry organizations, professional organizations	Green lending, aligning financial services to client aspirations, supply chain
Investors and Analysts	Individual meetings, regular updates, investor conferences/presentations, quarterly earnings calls	Financial performance, long-term strategies, transparency, cybersecurity, compensation practices
Media	Individual meetings, news releases	Supply chain, financial performance, climate change, corporate responsibility goals
Peers	Industry organizations, professional organizations, individual meetings	Demand for corporate responsibility transparency, common approaches to industry issues, impact of regulations, innovation, supply chain
Suppliers	Regular reviews, surveys, individual meetings	Technology and innovation, common ground on sustainability, cost/beyond basic metrics, partnerships, efficiency

Corporate Responsibility Platform Alignment

In addition to aligning our Corporate Responsibility reporting with the GRI Standards, Comerica recognizes the significance of the United Nations’ Sustainable Development Goals (SDGs) and the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standards for the Financial Sector as guidelines and targets when determining the areas in which we can make the most impactful contributions toward global sustainability efforts. The table below illustrates how our Impact Topics and Corporate Responsibility Platform (organized by report section) align with both SDGs and SASB topics.

While there may be other SASB financial services standards containing information relevant to a portion of our operations, Comerica has determined that SASB’s Commercial Banks standard is most applicable for our core business. Additionally, SASB standards use the Sustainable Industry Classification System® 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. See our [SASB Standards Content Index](#) for more information.

Corporate Responsibility Platform Element	Report Section	SDG Alignment	SASB Topic Alignment
i. Provide access to capital focused on underserved and underrepresented communities and small businesses	Customers		Financial Inclusion and Capacity Building Incorporation of Environmental, Social and Governance Factors in Credit Analysis
	Community		Financial Inclusion and Capacity Building Incorporation of Environmental, Social and Governance Factors in Credit Analysis
ii. Value the perspectives of all colleagues and outreach to diverse organizations to promote careers in the financial services industry	Colleagues		
	Inclusion		Financial Inclusion and Capacity Building
iii. Invest in financial education for underserved communities	Community		Financial Inclusion and Capacity Building
iv. Address climate change by reducing our GHG emissions, managing climate risks and supporting our customers	Environment		Financed Emissions Incorporation of Environmental, Social and Governance Factors in Credit Analysis Systemic Risk Management
v. Utilize, design, develop and deploy innovative and efficient digital systems while considering ethics, transparency and security	Responsible Business		Business Ethics, Systemic Risk Management Data Security
	Customers		Financial Inclusion and Capacity Building Incorporation of Environmental, Social and Governance Factors in Credit Analysis

Oversight of Corporate Responsibility at Comerica

Comerica's commitment to the long-term value embedded in our Corporate Responsibility Platform begins with our leadership. Our Comerica Incorporated Board of Directors (our "Board") and executive leadership share responsibility for identifying and overseeing the most impactful corporate responsibility matters for our company.

Board of Directors

At year-end 2024, our Board consisted of 11 independent directors plus our Chairman, who oversee and guide our corporate responsibility-related commitments, policies and programs. They have each reviewed and committed to abide by our Code of Business Conduct and Ethics for Members of the Board of Directors, which is a code specific to their positions of responsibility and influence within our company. For more information on the Board, review our [2025 Proxy Statement](#).

Board Committees

- The Enterprise Risk Committee (ERC) of the Board oversees Comerica's risk management, including cybersecurity and information security risks, as well as environmental and social risks (including, but not limited to, Comerica's management of risk pertaining to sustainability and corporate responsibility). The Enterprise Risk Committee is briefed on technology risks on a quarterly basis at each regularly scheduled meeting. Additionally, Comerica's management-level Enterprise Risk and Return Committee that was established by the Enterprise Risk Committee coordinates risk-related activities across the Company, including climate-related risks, and reports on these risks. The Enterprise Risk Committee also reviews Comerica's business continuity program.
- The Governance, Compensation and Nominating Committee of the Board is tasked with reviewing Comerica's human capital management strategy and talent development program, including recruitment, evaluations, development activities and compensation programs. The full Board is provided with annual workforce updates.
- The Audit Committee of the Board oversees the integrity of Comerica's financial statements, Comerica's compliance with legal and regulatory requirements, the outside auditor's qualifications and independence, and the performance of Comerica's internal audit and credit review functions and outside auditors, including with respect to both bank and non-bank subsidiaries.
- The Compliance Oversight Committee oversees various regulatory and compliance matters, with a focus on risk management.
- The Qualified Legal Compliance Committee assists the Board in promoting the best interests of Comerica by reviewing evidence of potential material violations of securities law or breaches of fiduciary duties or similar violations by Comerica or any officer, director, employee or agent thereof, providing recommendations to address any such violations, and monitoring Comerica's remedial efforts with respect to any such violations.

[Governance Guidelines](#) outline the Board's evaluation process, which includes an annual self-evaluation of the full Board and its committees focusing on areas for improvement, including skills and experience represented on the Board.

Board Leadership in 2024



Michael G. Van de Ven
Governance, Compensation and Nominating Committee Chair



Arthur G. Angulo
Enterprise Risk and Compliance Oversight Committee Chair



Roger A. Cregg
Audit and Qualified Legal Compliance Committee Chair



Barbara R. Smith
Facilitating Director

2024 Corporate Responsibility Governance Overview

Comerica Incorporated Board of Directors

Audit Committee	Enterprise Risk Committee	Governance, Compensation and Nominating Committee
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Executive Committees

Environmental, Social and Governance Committee	Enterprise Risk and Return Committee
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Cross-Functional Corporate Responsibility Support Teams/Groups

Green Office Teams	Impact Teams	Office of Nonfinancial Reporting
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Inclusion Education Council	Corporate Responsibility Reporting Group
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Functions That Enable Corporate Responsibility

Risk	Audit	Investor Relations	Procurement	Technology
Legal	Government Relations	Finance and Accounting	HR	Inclusion
Sustainability	Contributions	Communications	Credit	Wealth Management
Retail Bank	Commercial Bank	External Affairs and Volunteerism	Real Estate	Marketing and Customer Experience



Executive Level

Corporate Affairs Division

Comerica established the Corporate Responsibility Division (now termed Corporate Affairs) in 2021 to serve as a focal point for all of the collaborative corporate responsibility efforts across the bank. Corporate Affairs and its colleagues serve as a corporate catalyst to enhance synergies, develop fresh ideas, standardize reporting, monitor the corporate responsibility landscape for best practices and take note of the resulting benefits to colleagues, customers, communities and the planet. Corporate Affairs also works to identify emerging corporate responsibility issues and brings them to the attention of appropriate business unit(s) and Comerica leadership. Corporate Affairs is overseen by the Executive Director of Corporate Affairs who serves on Comerica’s Management Executive Committee and leads Comerica’s Environment, Social and Governance Committee. In early 2023, this division was moved under Comerica’s Chief Administrative Officer (who reports directly to the Chairman, President and CEO).

Environmental, Social and Governance Committee

The Environmental, Social and Governance Committee drives long-term value by engaging senior leadership from across the bank in identifying the most significant corporate responsibility issues for the company; determining strategies, priorities and goals; creating policies and programs to address these issues; and monitoring progress. The Environmental, Social and Governance Committee is chaired by the Executive Director of Corporate Affairs and members include representatives from all three Comerica business lines, the Chief Inclusion Officer, Chief Accounting Officer, Director of Corporate Sustainability, Director of External Affairs, Director of CRA Governance and Reporting, Director of Investor Relations, Director of Enterprise Risk and Credit Review, Director of Credit Analytics and Strategy, Director of Government Relations and other select representatives from across Comerica.

Enterprise Risk and Return Committee

The Enterprise Risk and Return Committee (ERRC) is responsible for the coordination and oversight of risk-related activities across the company, including climate-related risks. The ERRC is chaired by the Chief Risk Officer and authorized by the Board’s ERC to perform duties and initiate activities on its behalf.

Functions Within Comerica’s Corporate Administration Office

Corporate Administration Office

Overseen by the Chief Administrative Officer

Corporate Affairs Division

Overseen by the Executive Director of Corporate Affairs

Functions Within Corporate Responsibility

Sustainability	Community/ External Affairs	Media Relations and Corporate Communications
Corporate Quality	Social Impact/ Volunteerism/Corporate Philanthropy	Inclusion
Community Reinvestment Act (CRA)	Government Relations	CRA Governance and Reporting

Human Resources Division

Overseen by the Chief Administrative Officer

Functions Within Human Resources

Talent Acquisition
Talent Development
Total Rewards

Customers

“Our customers are at the heart of everything we do. We are dedicated to understanding their unique needs and providing tailored solutions to help them achieve their financial goals. Whether through digital banking tools or new financial products, we aim to provide the most convenient, efficient and secure services available. Building long-lasting relationships with our customers is a priority. We continue to focus on trust, transparency and personalized service to ensure our customers feel valued and supported every step of the way.”

Peter Sefzik

Senior Executive Vice President,
Chief Banking Officer



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Customers

The Customer Comes First — a Core Value that embodies our unwavering commitment to exceptional customer experience. By working to understand our customers and providing them with meaningful experiences, we are committed to delivering excellent service and tailored solutions, knowing that each decision made is guided by dedication to putting the customer first.

Our commitment to customers encompasses safeguarding their information and protecting them from fraud. It also includes providing secure, innovative technology to enable us to meet their financial needs. By understanding our customers, we are able to leverage our relationship-based approach to delivering the right products and services to meet their evolving needs. Financial education and inclusion also support our current and future Comerica customers.

As evidence of our customer commitment, Comerica was recognized by Crisil Coalition Greenwich in 2025 with six Best Bank for Business Awards, four of which went to Small Business Banking: Values Long-Term Relationships, Advisory Capabilities of Relationship Manager, Satisfaction with Relationship Manager and Trust for Small Business Banking. Two awards went to Middle Market Banking for Satisfaction with Relationship Manager in the U.S. and Satisfaction with Relationship Manager in the U.S. (West). These recognitions speak to our strong focus on creating deep, long-lasting relationships and our continued commitment to listening and understanding our customers.

Across our three strategically aligned business segments, the Commercial Bank, the Retail Bank and Wealth Management, we work to support the financial success of businesses and individuals. By unifying product management, operations, technology and sales, we strive to provide consistent “One Comerica” delivery across our organization. Initiatives to provide enhanced digital capabilities have improved our customer experience while helping to mitigate risks for both our customers and Comerica. Our digital capabilities help streamline our support for customers, speeding up their implementation of our solutions.

Comerica’s Promise

The Comerica Promise guides our interactions as we work to provide the knowledge and expertise to meet the needs of both current and potential customers. Our promise, quite simply, is “to raise the expectations of what a bank can be.” By raising expectations, we deliver a higher level of service, a higher level of knowledge and a higher level of experience that customers want and deserve.

Raising expectations also aligns with corporate responsibility. Protecting against fraud and providing responsible marketing, financial inclusion and products that support environmental and social needs all work to support our unwavering commitment to excellence defined by the Comerica Promise.

2024 Customer Initiative Highlights

Commercial Bank

Comerica Investment Banking Team

We prioritized introduction of Comerica’s Investment Banking team to provide mergers and acquisitions advisory services to our customer base as we continued to build out the team. In addition, we enhanced payment product offerings, established a commercial deposit desk to better assist customers and expanded distribution capabilities to bank-brokered deposits, attracting more third-party payments providers.

Retail Bank

Retail Reimagined

In December 2023, we completed the rollout of Retail Reimagined to banking centers across all our markets. Retail Reimagined positions us to compete, thrive and lead in a new era of hyper-competitive banking and elevated consumer and business expectations. We are laser-focused on creating a consistent, extraordinary experience for our customers.

Throughout 2024, we continued to refine the operating model to drive greater effectiveness by adjusting the staffing model across our footprint to ensure we have the right people in the right banking centers to serve our customers. We also standardized banking center hours of operation so that our customers have a consistent experience regardless of the location they visit.

Wealth Management

Comerica Financial Advisors

In 2024, Comerica focused on integrating our strategic partnership with Ameriprise Financial in order to continue driving success in new client acquisition and supporting existing relationships with best-of-class tools, technology and advice to our brokerage clients. As a result of this partnership, we continue to attract new clients and support the range of customer needs with class-leading solutions.

The Customer Comes First

Meaningful Interactions

A hallmark of our strong reputation is our ability to develop connections with our customers and potential customers. Providing a high level of respect and taking interest in everyone is ingrained in our culture and leads to loyal long-term relationships. Our bankers act with integrity, delivering on our core values, including The Customer Comes First. Colleagues also complete compliance training each year to ensure adherence with applicable regulations and laws. Our interactions lead to a deeper understanding of each customer's unique situation and goals, which allows us to best identify and deliver the right solutions and exceptional service.

Purposeful, Responsible Marketing

What we say and how we say it are foundational to successful outcomes for our customers. We are committed to presenting our products and services in a relatable, clear and honest way in our marketing materials and advertising, which brings value to our existing and potential customers. Our efforts include:

- Insights from our frontline colleagues, customer surveys and research to deliver relevant messaging in easy-to-understand terms.
- A review of marketing materials for compliance with applicable laws, rules and regulations, allowing for adherence to the Equal Credit Opportunity Act; the Truth in Lending Act; the Truth in Savings Act; Unfair, Deceptive and Abusive Acts and Practices; and the CAN-SPAM Act, among others. This includes identifying proper disclosures, terms and conditions for products and offers.
- Applicable legal and compliance reviews in accordance with the Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC) regulations for certain types of marketing materials.

Prioritizing Customer Satisfaction

Grounded in our proud heritage as a relationship bank, we strive to earn lifelong customers by making their satisfaction our highest priority. Gathering feedback in formal and informal ways supports our unwavering commitment to exceeding customer expectations for the value we deliver and the exceptional service we provide.

- As bankers and advisors, we lead conversations with customers that uncover their needs and establish emotional connections.
- Our Customer Experience Management (CXM) team regularly conducts focus groups and field research studies to ensure we bring customer-centric insights into our strategic decisions and initiatives as well as our continuous improvement efforts. We work to better serve our customers by deeply understanding their financial goals and banking attitudes to develop the product, technology and service experiences we offer.

- Consistently delivering exceptional experiences to our customers depends on the performance quality of every single colleague, every single day. Our VOICES program solicits our customers for feedback each week to help us monitor their satisfaction with Comerica interactions in nearly all of our delivery channels. Findings from the program help us surface actionable opportunities to continually improve experiences in our banking centers, Customer Contact Center and digital products as well as to coach our customer-facing bankers, advisors and associates. We prioritize resolution if customers tell us we fell short of meeting their expectations.

Managing Customer Complaints

Our Corporate Quality department within our Corporate Affairs Division reviews and tracks customer complaints using our complaint management system. Comerica analyzes data for key trends across business units and customers to identify challenges that might have broad impacts. This allows us to proactively address areas of concern and continually improve our services. Complaint data is regularly provided to Comerica's senior management and the Board's Enterprise Risk Committee.

Consumer and Fraud Protection

Our customer relationships are built on trust, including trust in us to safeguard privacy and financial information. While we work diligently to protect our customers' information and privacy, we also provide resources to assist our customers in better protecting themselves. [Comerica.com](https://www.comerica.com) includes a Fraud Center tab with links to summaries of common fraud scams, special alerts to advise customers of known fraud activity and methods for reporting suspected fraud.

Our engagements with external stakeholders reveal that customer privacy and protection — defined as securing customer data, confidentiality and physical safety — are among their most important priorities. Along with cybersecurity, these topics are recognized as critical to our business success. To learn more, see the [Privacy and Data Protection](#) portion of this report.

“The Core Value of Trust. Act. Own. creates a culture of respect, reliability and results. We take ownership by stepping up, solving problems and continuing to move forward.”

Kesi Bradley
Senior Nonfinancial Reporting Specialist

Small Business Support

At Comerica, we consistently leverage our expertise in banking business while living our Core Value of “The Customer Comes First.” In 2024, we continued our focus on enhancing solutions for small businesses. Specifically, we added more than 100 small business bankers across all markets, increasing our expertise in this space. We continued expanding our signature offerings for small businesses by doubling the number of members for Comerica BusinessHQ™ in Dallas, where small business owners receive a no-cost office, business counsel, access to capital providers and more. In addition, our deposit portfolio outperformed the industry in 2024, and we had the best net customer growth results since 2020. We attribute this growth to our consistent customer satisfaction; we were ranked #1 in “getting things right the first time” and #2 in “overall satisfaction, bank loyalty and likelihood to repurchase” in Barlow Research’s 2024 Small Business Satisfaction Report.

“We continue to invest in small business success through expanded access to expert bankers, innovative lending programs and award winning treasury tools — all while earning top marks in customer satisfaction, driving meaningful growth and deepening our commitment to the communities we serve.”

Omar Salah

Executive Vice President,
National Director of Small Business Banking

Loans

Comerica Bank is a National Small Business Administration (SBA) Preferred Lender. Our SBA lending, including government-guaranteed 7(a) and 504 loans, totaled \$186 million in 2024. The 7(a) Loan Program, SBA’s most common loan program, includes lending that ranges from \$10,000 to \$5 million and is the SBA’s primary program providing financial assistance to small businesses.

Digital Solutions

Throughout 2024, Comerica has debuted several digital solutions for entrepreneurs with a focus on payments and access to convenient capital, such as our investment in Zelle® with almost 1 million transactions and approximately \$500 million in payment volume with small business customers. Comerica has also delivered the following to small business customers:

Comerica Small Business Treasury Solutions

Small business and business banking customers continue to benefit from award-winning treasury products that drove almost a 130% increase in treasury sales from 2022 to 2024. We also streamlined the commercial loan closing process to enhance efficiency and deliver an improved customer experience, and our loan funding time is aligned with newly implemented industry standards.

Comerica Small Business Convenient Capital®

Comerica Bank’s first fully digital, streamlined lending platform provides convenient access to capital, quick loan decisions and innovative value-added benefits for our small business customers. Since the launch of Convenient Capital, Comerica has doubled loan origination volume and experienced a 10% increase in loan balance growth year-over-year.

SizeUp by Comerica

During National Small Business Week, Comerica Bank introduced a new exclusive and complimentary online tool that allows small business customers to tap into industry-specific research, insights and analysis to help them make data-driven business decisions while providing a competitive advantage in a highly challenging business environment.

Innovative Small Business Resources

With a steadfast commitment to supporting small business customers and helping them grow and cultivate their businesses, Comerica provides unique offerings that innovate the delivery of critical resources to entrepreneurs and business owners. Utilized approximately 8,000 times in 2024, these resources, which include Comerica BusinessHQ, Comerica CoWorkSpaces®, Comerica SmallBizCo-op® and Comerica ShredSite® programs, all began in the Dallas-Fort Worth market in prior years. In 2024, we expanded Comerica SmallBizCo-op in Michigan and continue to look at expansion of these programs in other markets.

Comerica BusinessHQ™

Launched on May 9, 2023, Comerica BusinessHQ is a collaborative space that provides integral services and value to small businesses in the Southern sector of Dallas. Offerings focus on coworking spaces, incubation fellowships and technical assistance. These priority areas allow BusinessHQ to deliver the most impact as we continue to contribute to the Southern sector's economic revitalization efforts. Since its inception, Comerica BusinessHQ has expanded access to increase small business participants by 120%.



Comerica also continued to foster partnerships that provide effective and impactful small business incubation and technical assistance at BusinessHQ, including with the Veteran Women's Enterprise Center, a Community Incubation Partner, as well as Community Strategic Partners such as Business & Community Lenders of Texas, Dallas Black Chamber of Commerce, DreamSpring, Bootstrap Entrepreneurs Inc, DFW Minority Supplier Diversity Council, EMPOWER Series, LiftFund DFW Women's Business Center, Texas Black Expo, SCORE Dallas, National Youth Chamber of Commerce powered by Project Still I Rise, Philippine-American Chamber of Commerce of Texas DFW and the United Way of Metropolitan Dallas.

In recognition of BusinessHQ's impact on the community, in 2024, The American Bankers Association (ABA) Foundation awarded Comerica the ABA Foundation Community Commitment Award in the category of Community & Economic Development for our impact in supporting Southern Dallas small businesses and nonprofits through Comerica BusinessHQ.



Comerica SmallBizCo-op®

Comerica SmallBizCo-op, first launched in 2022 in the Dallas-Fort Worth market, provides a range of no-cost benefits available exclusively to Comerica small business customers. Designed to help small businesses grow and thrive with benefits that are often otherwise unattainable, some of the services offered include the opportunity to entertain a client or share a perk with their employees through free sports tickets, recording and airing of radio advertising and significant discounts on everyday business purchases. Sports tickets and radio advertising were available in Dallas-Fort Worth and throughout Michigan in 2024, and we plan to continue expanding the offerings to other markets.

Responding to Community Needs

Comerica partnered with NexTech High School of Grand Rapids, Michigan, to support and bridge the equity requirements of the school. NexTech High School is a tuition-free school offering enhanced learning opportunities to their students, giving them the ability to guide their own educational experience through a blended curriculum approach. NexTech High School’s mission is to provide personalized and transformational high school experiences that prepare each student academically and emotionally for success in college, work and life.



Comerica CoWorkSpaces®

Comerica CoWorkSpaces provide free, reservable office space to our small business customers for presentations, brainstorming or just an escape from daily distractions, available at 13 locations in the Dallas market. They all are supplied with monitors, printers and high-speed Wi-Fi, plus complimentary coffee and water. A variety of space configurations are available, including private offices, conference rooms and more. Additionally, our popular Community Space location in Dallas is also available to 501(c)(3) nonprofits at no cost, regardless of whether they bank with us, with space to accommodate larger groups. We continue to plan for expansion of CoWorkSpaces into other markets.

“Since we launched CoWorkSpaces in 2023, we’ve seen customers reserve our space over 2,030 times, with utilization continuing to rise through Q1 2025, and an average satisfaction rating of 9.75. All of which tells us that this is a valuable resource for our small business clients in Dallas and we are so pleased to contribute to their continued success.”

Brent Harraman
Senior Vice President
Regional Director, Small Business Banking
Texas, Arizona and Florida





Comerica ShredSite®

Comerica provides a free shredding service, Comerica ShredSite, to small businesses and individuals in the community regardless of where they bank. This service offers a convenient way to safely and securely destroy confidential documents for free while also reducing paper in landfills. In 2024, we collected over 350,000 lbs of paper in the Dallas-Fort Worth area through the ShredSite program.

Education and Skills Training

Comerica Bank colleagues continued to invest their time and expertise in small businesses and entrepreneurs through partnerships with local community-based organizations and nonprofits, including offering Comerica’s Business \$ense Bootcamp™. In 2024, Comerica colleagues dedicated nearly 2,000 hours of small business technical assistance to entrepreneurs and small business owners in multicultural, black, indigenous and people of color communities.

Our Comerica Financial Education Brigade (CFEB) is a collection of colleague volunteers dedicated to improving communities through financial education and empowerment. CFEB members are trained to facilitate financial education workshops and to provide technical assistance to small businesses.

Through innovative programs, such as Comerica Works, Money \$ense and the Comerica Small Business Resource Centers, we also provide financial and business skills training to enhance technical knowledge and resources to help advance the journey of entrepreneurship.



Innovation and Technology

Our use of innovation and technology is critical to delivering customer experiences and enhancing the productivity of our colleagues. Comerica’s culture of innovation gives life to ideas so that we can meet our customers’ evolving needs and desires, improve our colleagues’ work experiences and strengthen our relationship-based approach to banking.

We listen to customer and colleague feedback to ensure we are meeting their needs. Our teams use a streamlined innovation process to ideate, test, pilot and roll out technology solutions for our colleagues and customers.

As a relationship bank, Comerica is committed to providing our customers with a personalized, seamless banking experience. In 2024, we continued to focus on our customer experience, providing faster services, with an increased visibility into the process and uplifted available self-service capabilities.

We simplified the process for customers to obtain small business loans by revising the information gathering portion of the underwriting process, allowing us to understand customer needs more efficiently. This resulted in a simplified user experience focused on asking targeted questions about a customer’s loan needs and displaying options as information is entered. In addition to enhancing our customers’ experience, we reduced underwriting turnaround time and improved overall quality.

Changes in Digital Technology (2024 vs. 2023)

24%

increase in average volume of real-time payments

10%

increase in Zelle transactions

3%

increase in monthly checking statements sent electronically

5%

increase in web bill payments sent electronically

10%

increase in retired legacy applications and underlying infrastructure

3%

increase in number of mobile banking users



Our Comerica CoWorkSpaces® offer complimentary collaboration spaces for all customers who need a place to cultivate new ideas. These spaces are equipped with technology to help them manage their business needs, such as high-speed guest Wi-Fi, printers and informational kiosks.



Innovation in Open Banking and AI

In 2024, we began expanding our open banking capabilities through the use of Application Programming Interfaces (APIs) for secure data sharing that further enhance our payment processing offerings. Furthermore, we established AI governance for safe use and introduced targeted AI solutions to improve our internal colleagues' efficiency. These AI solutions have enhanced operational efficiency by automating routine tasks and processes, which reduce costs and streamline operations.

In 2024, Comerica achieved significant milestones in technology innovation, particularly through the modernization of our cloud and technology infrastructure. We continued to embrace our cloud strategy with a focus on working toward the closure of our last remaining on-premises data center by migrating the majority of the workloads to our strategic cloud provider. This transition enabled us to build a next-generation cloud environment that significantly uplifts security, standardization, automation and resiliency through the use of cloud native services running multi-availability zones and regions for failover and disaster recovery. Additionally, we modernized a large number of our business applications to take advantage of these cloud-native capabilities, thereby reducing legacy technology and enhancing operational efficiency. These advancements have positioned us to better serve our customers with improved performance, scalability and security.

New Frisco Business & Innovation Hub

In 2024, Comerica held a ribbon-cutting ceremony for the opening of its newest and largest CoWorkSpaces location in Frisco, Texas. The 4,023-square-foot innovative hub, which features fresh and updated structural designs, provides free spaces for coworking, networking events and community engagement. It serves as a local business pillar for North Texas' small business customers, nonprofit organizations and entrepreneurs.



Financial Inclusion

At Comerica, we support financial inclusion through our commitment to providing access to capital to underserved communities, women, minorities and small businesses, as highlighted as an element of our Corporate Responsibility Program strategy. When our customers are successful and our communities prosper, Comerica thrives as well.

Our financial inclusion efforts include:

- Improving the accessibility of our banking centers
- Providing appropriate products to help meet the needs of the underbanked
- Providing remote banking channels, such as web and mobile banking
- Supporting relevant partners in low- and moderate-income (LMI) communities through funding and service

Living Our Financial Inclusion Commitment

To meet the needs of the underbanked, we have tailored products such as the Comerica Secured Credit Card, an entry-level, cash-secured credit card that helps those who do not qualify for a traditional card build a 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 \$250 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.

As part of our commitment to environmental responsibility and customer accessibility, we continuously assess our banking center network to ensure strategic, visible locations and modern, efficient buildings. We regularly upgrade aging infrastructure and equipment while expanding digital capabilities to enhance access and improve the customer experience.

gomerica™

Based at the Boys & Girls Club in East Naples, Florida, Comerica's mobile banking service bus (gomerica) serves as a community care vehicle that helps meet the needs of the community from within the community. In addition to the mobile outreach efforts in underserved communities or communities impacted by natural disasters, gomerica engages in special visits with community partners to engage young people in financial education, resources and literacy. In 2024, the bus made several stops at the Lorenzo Walker Technical College where we conducted a series of financial literacy classes for students in their Adult Education and GED programs. We distributed more than 200 backpacks and school supplies at the Boys & Girls Club of Collier County and also served as judges and sponsors for their Youth of the Year Program. The gomerica bus also made an appearance at the Guadalupe Center's Leadership Day where we taught classes to members of their Tutor Corp around budgeting and goal setting.



Impact Teams

Our Impact Teams operate across our primary markets to pursue strategies that meet the banking needs of our communities. Each team has a budget to support business development and community outreach with relevant associations and nonprofit partners serving underserved communities to increase financial inclusion. Comerica's teams contributed \$649 million in closed business in 2024. Our Impact teams are discussed in more detail in the [Impact Teams](#) portion of the Inclusion section.



Targeted Programs for Military and Veterans

Comerica's Military and Veterans Impact Team strives to build strong community and business relationships in support of current and former military service members in the communities we serve.

Our Michigan Military and Veterans Impact Team focuses on honoring those men and women who have made the ultimate sacrifice through various service activities, including Wreaths Across America, whose mission is to Remember, Honor and Teach by coordinating wreath-laying ceremonies at veterans' cemeteries. This team also supports veterans in need by organizing food and supply drives for local Veterans Affairs hospitals and providing avenues for military members, veterans and their families to thrive in their post-service lives by partnering with local nonprofit organizations with a military focus.



Financial Education Brigade

Comerica's Financial Education Brigade (CFEB) also helps promote financial inclusion through education. For example, the CFEB provides assistance to the next generation of entrepreneurs and small business owners through our partnership with Network for Teaching Entrepreneurship. CFEB members offer financial education to many individuals looking to own homes in LMI communities. For further information on how our financial education efforts support financial inclusion, see the [Financial Education](#) portion of the Community section.

ADA Accessibility and Spanish-Language Options

To best serve our Spanish-speaking customers, we offer Spanish-language options at our ATMs. In addition, 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. Comerica also abides by the Americans with Disabilities Act (ADA) and provides services for visual- and/or hearing-impaired customers.

Colleagues

“Our success at Comerica is a direct result of the hard work and dedication of our colleagues. Collaboration across departments is key, and together we are creating a unified, innovative and productive workplace. Our Core Value of ‘One Comerica’ exemplifies our commitment to provide all colleagues with opportunities for growth and development. By investing in training, mentoring and career advancement, we are helping our employees reach their full potential. By championing innovation and a shared dedication to our customers and communities, we empower our team to achieve successful results and ensure Comerica continues to be a company where talent thrives and ambitions are realized.”

Megan Burkhart

Senior Executive Vice President,
Chief Administrative Officer



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Colleagues

Our promise of exceeding customer expectations starts with one of our greatest strengths — our more than 7,500 talented colleagues. We strive to make Comerica a great place to work. Our efforts focus on attracting, engaging and retaining top talent by fostering a respectful and inclusive workplace and culture, and by communicating regularly, openly and honestly. We invest in our people, empowering them through opportunities to adapt, develop, innovate and grow in their careers.

Our Core Values are particularly significant to our colleagues, as these values describe how we work together to deliver on the Comerica Promise to raise expectations:



One Comerica

We believe growth is achieved when our colleagues act with common purpose in support of our shared goals.



The Customer Comes First

We put our customers at the center of every conversation and make their satisfaction our highest priority.



The Bigger Possible

We encourage a culture of bold and relentless curiosity, where any idea has a chance to be heard.



A Force for Good

We value empathy and integrity as we work to support a more inclusive and sustainable workplace and world.



Trust. Act. Own.

Everyone is empowered to do what's right, speak up and be heard while being accountable for their actions and commitments.

Our colleagues understand and are committed to executing on these values. In turn, we enable our colleagues to thrive at work and in their daily lives with continuous learning and engagement opportunities, comprehensive benefits and competitive compensation programs.

2024 Achievements: A Great Return on Colleague Investment

11 years

average tenure

35%

of the approximately 2,216 open colleague positions filled by internal hires

84%

2023 sustainable engagement favorability score

2024 Workforce at a Glance: Our Team

7,565

Comerica full-time U.S. colleagues

363

Comerica part-time U.S. colleagues

For more metrics on our workforce, view our [Colleagues Key Metrics Table](#).

Talent Attraction

We use a variety of creative recruitment strategies to attract top talent. Our wages and benefits are competitive, and we invest in innovative tools and programs to identify qualified candidates with appropriate skill sets and values.

We measure our talent acquisition strategy success on speed and quality of acquisition, inclusion of the applicant pool, new colleague retention and the experience we provide to our candidates and hiring managers alike. Overall performance metrics are tracked for each key business line. We regularly evaluate and modify our sourcing strategies and support structures to ensure that we consistently meet performance targets.

For the second consecutive year, Comerica set a record for the most annual applications received in a single year, with an increase of 4% year-over-year in candidates applying to roles at Comerica Bank. The record application flow led to Comerica achieving a time-to-fill of 60 days during 2024.

Our Colleagues Are Our Greatest Source of Talent:

- Our #1 source of hire is our existing workforce with 35% of open colleague positions filled in 2024 being internal hires.
- Our #2 source of hire is colleague referrals with approximately 21% of all hires coming from colleague referrals.

2024 Hiring Achievement

4%

increase in applicants compared to 2023
(new enterprise record)

60

days to fill open positions

Summer Internships

Our summer internships help college and graduate-level students explore their interests in banking. Specialized internships in Technology, Audit, Commercial Banking, Private Banking, Wealth Management and Enterprise Risk expose students to different job functions, mentorship and the opportunity to experience the work environment firsthand.

Attracting New Colleagues

When it comes to looking for new talent, we use a variety of techniques to connect with potential candidates in our communities. We participate in outreach and recruitment efforts to hire undergraduate and graduate students, and we offer programs to help them develop the skills and experience necessary for successful careers.



Learning and Development

We believe a great place to work is one where our colleagues have the tools and resources to become confident and competent as they drive their career growth. Our development philosophy centers around learning and empowerment. To position our colleagues for success, we offer a rich mix of accessible learning formats, including formal and informal education, on-the-job experience, exposure to stretch opportunities and tools necessary to expand knowledge and skills.

Comerica University

Many learning opportunities are provided through Comerica University, a thoughtfully curated all-colleague, all-level learning resource. Comerica University offers a wide variety of training topics, including sales, products, risk, operations, technology, underwriting, management, leadership and professional skills. To ensure accessibility and to meet our colleagues where they are, training is offered in various formats and lengths, including self-paced, online, classroom, book, video, mobile and podcasts. Comerica University is also the home of premier, award-winning programs such as Comerica's Leadership Development Program, the Emerging Leaders Program and our Management Essentials Certificate series.

2024 Highlights

23,099

skills-based training opportunities were offered to Comerica colleagues

53%

of colleagues took advantage of voluntary skills training

197,746

of training hours were completed by colleagues



Leadership Programs

We offer a variety of programs for our leaders, from newly minted managers to executive leadership roles. In 2024, we enhanced our signature and award-winning Leadership Development Program, incorporating a competitive event where participants “pitched” strategic projects to executive “investors” — similar to a popular broadcast television program. This event required the participants to search, determine and pitch solutions and ideas that they found intriguing or needed by the company. The participants especially leveraged one of the company's Core Values called The Bigger Possible, and they rose to the occasion.

2024 Leadership Development Participation

28

colleagues graduated from the Leadership Development Program

40

senior leaders participated in the Senior Leadership Program

Senior Leader Programs

In 2024, more than 40 Comerica leaders participated in our Senior Leadership Program. In its third year, this program is designed to develop senior leaders who foster a culture of courage and performance - one where initiative, calculated risk-taking, forward-thinking and acting are core to the business. For our executives, Comerica offers Leadership at the Peak through the Center for Creative Leadership.

New Hire Programs

Also in 2024, we continued to refresh new hire training for Retail Banking colleagues, yielding a 27% increase in participant satisfaction ratings, and a 41% increase in colleague preparedness after those participants had been in their roles for a month.

Enhancing Learning Opportunities

We delivered more than 300 new resources and certificates to support banking-related topics for all colleagues in 2024. These included online courses, certifications and ongoing webinar series. In 2024, colleagues completed about 10% more courses, yet did so in less time, indicating the training delivered was helping to increase efficiency.

Leader Development Programs

The Credit College Program provides classroom-like training to enhance the ability to analyze financial statements, including cash flow and working capital, as well as improve presentation skills and effective team management. The program lasts two weeks and is part of Comerica's Commercial Banking Training Program. It is a thoughtful and strategic program that develops an inclusive, sustainable and enduring leadership pipeline that aligns with Comerica's Core Values and relationship culture.

2024 Comerica Credit College Program Graduates



Comerica's Leadership Development Program develops future senior leader talent. It brings together middle-management colleague participants and senior leaders for skills development, mentoring and networking. The participants also work on collaborative projects to address key strategic challenges.

Comerica's Leadership Development Program Class of 2024



The Comerica League – 2024 Risk-Focused Courses:



In 2024, as part of an enterprise-wide program focusing on risk management, we developed a robust lineup of risk-focused courses themed around the "Comerica League." Leveraging a bold art style and interconnected characters and narrative, colleagues learned about the many facets of risk and how they applied to their everyday responsibilities.

External Development Programs

We also encourage colleagues to participate in external development programs. We offer tuition assistance for eligible full-time colleagues. In 2024, we paid \$400,829 to 103 colleagues working on their college and advanced degrees.

Employee Engagement

At Comerica, open communication is cultivated, and colleagues are seen, heard, informed and empowered. To ensure long-term, sustainable engagement, we foster a work experience that supports productivity and performance and energizes our colleagues' individual physical, interpersonal and emotional well-being.

Communicating With Colleagues

We believe in regular honest, transparent communication between leaders and colleagues. This is an important factor in maintaining and enhancing our collaborative work environment, where colleagues are treated with dignity and respect. We use a variety of communication channels, including email, Comerica's intranet, town halls and one-to-one discussions, to engage colleagues and keep them informed. We recognize that the relationship between our managers and colleagues is an important key to our success. To underscore that importance, we provide our managers with tools and information to help them successfully connect with and lead their teams.

Engagement Around Purpose

To empower our colleagues and stay relevant, we embed purpose across our employment journey, as colleague participation and engagement is a powerful driver of our inclusive culture, environmental sustainability and community involvement efforts. Examples of these engagement activities include our Inclusion Awareness and Sustainability Awareness Programs, Green Office Teams, Impact Teams and a variety of volunteering events within our local communities. For additional information, view the [Community](#) section and [Environment](#) section of this report.

2024: Celebrating Our History

In 2024, Comerica celebrated a historic milestone — its 175th anniversary. To honor this momentous occasion, colleagues participated in a year-long celebration during which we honored our past and continued to define how we innovate and shape our future.

Throughout the year, colleague-centered festivities marked our Employee Town Hall meetings in each market. A new Comerica history book was developed and each month, a new chapter of history of the history book was shared with colleagues. Monthly spotlights on the company intranet also recognized colleagues across the organization for their unique contributions to the company.



WorkBest Hybrid Work Program

We adopted Comerica’s WorkBest Program in 2021 to support returning our colleagues to the office following the COVID-19 pandemic using a hybrid work model. WorkBest allows for flexibility while reigniting opportunities for synergy, collaboration and ongoing engagement.

The WorkBest program:

- Recognizes that different positions “WorkBest” in different ways;
- Maintains our culture and enables colleagues to participate in rich collaborative experiences while building strong working relationships;
- Provides the flexibility expected by colleagues and the support necessary for them to do their best work, no matter where they are located; and
- Helps optimize Comerica’s real estate.

Addressing Turnover

We regularly track our turnover rate by type and market. The results, in combination with our engagement, help inform our retention, development and engagement programs. The [Colleagues Key Metrics Table](#) shares our turnover data.

Turnover remained consistent in 2024, in part because we continued to focus on retaining our talent by providing attractive benefits that are relevant to our colleagues, hybrid work arrangements through our WorkBest program, additional investments in training and development, maintaining competitive compensation programs and recognizing colleagues who embody our Core Values and the Comerica Promise through our Promise Champion awards.

Colleague Turnover Trend

17%

in 2022

13%

in 2023

17%

in 2024



Compensation and Benefits

Comerica offers a comprehensive compensation and benefit program designed to help meet our colleagues' varying needs as they are now and as they may evolve over time.

Competitive Pay

We strive to provide market-competitive pay to help us keep and attract talent. We use a formal compensation structure, which is aligned with the market each year and supports our pay-for-performance philosophy. For 2024, our minimum wage was \$18/hour.

To help secure our colleagues' futures, we provide all colleagues with a pension plan, a 401(k) with matching contributions and financial coaching options.

Comerica is one of the few companies providing an active pension plan to all colleagues.

Health and Well-Being

We continually evaluate our benefits programs to ensure they remain competitive, balanced and relevant to our colleagues. As part of the total rewards offering, Comerica provides a wide range of programs and supplemental services to help colleagues meet their personal needs and goals. We have always placed an emphasis on offerings that support the mental, physical and financial health of our colleagues.

We provide comprehensive medical coverage in which Comerica covers approximately 80% of the cost. In 2024, Comerica focused on increasing access to health benefits through program enhancements, providing support for colleagues to meet financial, family and personal goals and improve overall well-being. In addition to medical, dental and vision coverage, we offer a range of supplemental health plans so that colleagues have the coverage they need when they need it most.

Physical Health	<ul style="list-style-type: none"> • Medical & Prescription • Dental • Vision • Accident • Critical Illness 	<ul style="list-style-type: none"> • Hospital Indemnity • Long-Term Care • Short-/Long-Term Disability¹ • Cancer Care • Fertility Benefits
Financial Health	<ul style="list-style-type: none"> • Retirement Income Account Plan (Pension Plan) • 401(k) Plan and Employer Match • Employee Stock Purchase Plan • Health Savings and Spending Accounts 	<ul style="list-style-type: none"> • Life Insurance, AD&D and Dependent Life • Financial Coaching • ID Watchdog Identity Theft Program • Comerica Cares Fund • Business Travel Accident Insurance
Mental Health and Time Off	<ul style="list-style-type: none"> • Paid Time Off Program¹ • Paid Holidays • Time Off for Volunteering² • Cultural Floating Holiday³ • Parental Leave • Bereavement Time⁴ 	<ul style="list-style-type: none"> • Affordable access to mental health professionals via our medical plans • Employee Assistance Program (EAP) offering support for various colleague needs, provided through ComPsych
Other	<ul style="list-style-type: none"> • Tuition Assistance⁵ • Group Legal • Adoption Assistance 	<ul style="list-style-type: none"> • PerkSpot CoPerks Discount Online Shopping Program • Pet Insurance • Veterinary Discount Plan

¹ A minimum of 80 hours are available to exempt U.S. colleagues through Paid Time Off (PTO) Program.

² Full-time colleagues are granted up to 8 hours and part-time colleagues up to 4 hours of PTO annually to use for volunteer events.

³ Comerica grants 4 hours of PTO for full-time colleagues and 2 hours of PTO for part-time colleagues annually to use for cultural or religious observances meaningful to them.

⁴ Colleagues are provided up to 4 weeks of paid time off for bereavement.

⁵ Benefits are available to full-time colleagues who are scheduled to work 40 hours per week.

New in 2024

As part of our commitment to continually evaluate our health and welfare benefit offerings, we launched additional programs in 2024.

- Comerica began contributing up to \$2,000 to **Health Savings Accounts** for colleagues whose salary was below \$150,000, helping them to offset medical expenses now and in the future.
- An **enhanced cancer program** was incorporated in the medical plan to help colleagues and their families navigate a cancer diagnosis and include additional treatment options and therapies. Certified oncology nurses work directly with members to provide family and caregiver support, educate on treatment options, monitor medications and help facilitate clinical trial referrals.
- A comprehensive **fertility and family building benefit** through Progyny was introduced into Comerica’s benefit offering. With unlimited and comprehensive treatment coverage and access to high-quality care through Progyny’s premier network of fertility specialists, colleagues receive personalized emotional support and guidance for every path to parenthood.

Comerica Cares Fund

Established in July 2020 as a 501(c)(3) public charity, the Comerica Cares Fund provides assistance in the form of grants to colleagues in need due to a qualifying event, such as a disaster or personal hardship, that is not compensated by insurance. The Comerica Cares Fund receives corporate contributions as well as voluntary donations provided by colleagues who want to assist their peers who are facing unexpected financial challenges. In 2024, the Comerica Cares Fund disbursed \$94,650 in grants to Comerica colleagues.

2024 Impact

550

colleagues donated to the Comerica Cares Fund

61

applications approved

\$94,650

in Comerica Cares Fund grants approved and distributed for hardships, including home damage, domestic abuse and unexpected healthcare costs



Inclusion

“Inclusion is integral to our Core Value — A Force for Good — and is also a business imperative. We work tirelessly to ensure all colleagues have fair treatment, merit-based access and opportunity to advance at Comerica. We also seek to develop leaders with compassionate empathy to achieve two basic human needs for our colleagues: to feel they are valued for who they are and that they belong.”

Nate Bennett
Senior Vice President,
Chief Inclusion Officer



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Inclusion

Our Leadership Focus

At Comerica, inclusive leadership for executives, senior leaders, managers and our colleagues throughout the company has contributed to our high-performing culture and improved retention of our colleagues. Key focus areas include improving awareness, advancing empathy to improve relationships and building followership.

In 2024, Comerica completed Phase III of our Inclusion Education Program “Fearless Teams,” which centered around three key areas:

- What is psychological safety?
- How psychologically safe is your team?
- How to create a psychologically safe environment.

Strong Culture

Comerica colleagues participate in culture building through a variety of learning programs. Our culture-building learning programs target new hires, new managers and all colleagues annually. To ensure the continued effectiveness of colleague education, our programs are measured through qualitative assessments like our “Voice of the Colleague” engagement survey, where we assess the impact of our programs on our colleague’s overall well-being. We want to hear from our colleagues to ensure transparent communication through assessing the following:

Fair Treatment	Colleagues feel fairly rewarded and recognized
Empathy	Colleagues respect and value others’ opinions
Decision-Making	Team members give fair consideration to others’ ideas
Psychological Safety	Colleagues feel welcome to express their true feelings
Trust	Communications received from the company are honest and open
Belonging	People in the organization care

Tenure Fosters Long-Term Relationships

Banking is a business that relies heavily on the personal relationships and the quality of service provided by 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 an inclusive workplace.

The tenure of our colleagues allows Comerica to sustain long-term relationships with clients, customers and our vendor partners in all markets.

Our commitment to supporting an inclusive workforce has contributed to our ability to both grow and retain top talent as shown in our colleague average tenure.

Colleague Tenure for 2024 (%)

50%

0-5 years

23%

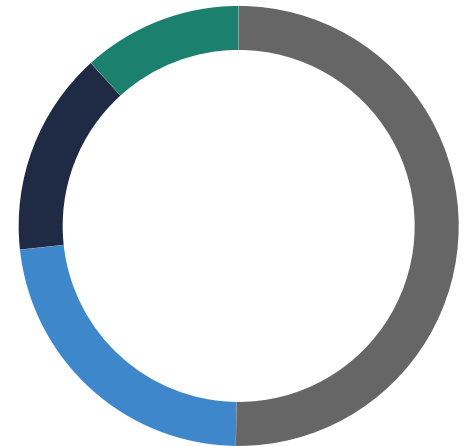
6-15 years

15%

16-25 years

12%

26+ years



Governance and Performance

Pay Equity Commitment

Comerica is committed to investing in our colleagues in various forms, such as training, development, benefits programs and equitable pay. To help support equitable pay, we use various policies and practices.

Pay Analysis

We regularly review our main components of compensation, such as salaries and bonuses by grade level and position, to determine if similar positions receive similar pay to the extent other factors can be equalized (e.g., time in position, performance and education). We also use a formal compensation structure that is aligned to market each year, as competitive compensation helps us keep and attract talent. We have made a corporate-wide decision to prohibit the solicitation of salary history from applicants in all of our markets and are committed to identifying and promoting best practices to reduce bias in hiring, promotion and compensation decisions.

Pay for Performance

Comerica has a pay-for-performance philosophy to align with the interests of our shareholders. Pay decisions are based upon the assessment of individual results (both quantitative and qualitative) as well as business unit or corporate performance. Manager training on compensation practices reinforces sound compensation governance and mitigates excessive risk.



Growing Awareness to Build Empathy

Our company-wide Awareness Program is foundational to Comerica's inclusive education platform focused on bringing colleagues together in an ever-changing society. This elective program was developed to advance empathy and recognize the commonalities we all share. Some of the dimensions of the program are as follows:



Generation



Mental/Physical Ability



Cognitive Style



Work/Life Balance



Leveraging Inclusion in the Workplace



Veteran/Military

The program provides certifications at bronze, silver, gold and platinum levels. In 2024, 68% of Comerica colleagues were enrolled in the program:

Certification Level

3,642

Bronze-level certified

3,045

Silver-level certified

2,559

Gold-level certified

1,645

Platinum-level certified

Impact Teams

Comerica’s colleague-led Impact Teams are open to everyone to contribute to the empowerment of our colleagues. They consist of colleagues interested in promoting inclusion in support of the many communities represented in our colleague base, as well as promoting career opportunities, colleague connection and community impact.

14 Impact Teams with 22 chapters in California, Michigan and Texas

- All Abilities and Allies
- African American
- Asian
- Comerica Speaks
- European Connection
- Jewish Heritage
- Mi Gente - Hispanic
- PRISM – LGBTQIA+
- Quantitative Professionals
- Salam
- Veteran Leadership
- Women in Technology
- Women’s Forum
- Young Professionals

Impact Teams Strategic Objectives

Commerce	Promote Comerica as the best bank for business within the communities we serve.
Community	Promote activities that support the growth of all communities and the social impact interests of Comerica.
Culture	Promote the cultural and social differences among our colleagues through positive representation and open discussion.

2024 Impact Teams Metrics

3,000+

colleagues participated in Impact Teams

300+

events held by Impact Teams

Comerica Asian and Pacific Islander chapter of the Asian Impact Team Celebrates Lunar New Year (LNY)!

The Asian and Pacific Islander chapter of the Asian Impact Team is committed to ensuring that all colleagues have access to the support they need to reach their fullest potential.

We successfully hosted the following events in celebration of the LNY with our colleagues:

- LNY celebration in Frisco, Texas, on February 13, 2024: We welcomed more than 70 colleagues to enjoy games, festivities and food for this Year of the Dragon. Additionally, Comerica’s Chief Inclusion Officer, Nate Bennett, and Comerica’s Chief Economist, Bill Adams, reflected on the importance of the event and welcomed colleagues to the celebration.
- LNY Celebration at our Operational Center in Auburn Hills, Michigan on February 14, 2024: We hosted a panel discussion on how colleagues celebrate LNY and welcomed more than 80 colleagues to enjoy Asian food, games, festivities and food for this Year of the Dragon. Additionally, Comerica’s Chief Information Security Officer, Juan Rodriguez, and Chief Procurement Officer, Gloria Oldani, joined with colleagues in a dragon dance performance.

In collaboration with our community partners, we proudly sponsored and actively participated in the following events:

- Cranbrook Chinese New Year Concert and Celebration on February 18, 2024 (Bloomfield, Michigan): Over 200 guests enjoyed the concert, face painting, Chinese tea and more cultural interaction activities.
- Detroit, Michigan, Chinese Business Association Lunar New Year Gala on February 25, 2024.

Our Impact Teams also provide business development and community outreach support, partnering with relevant associations and nonprofits. Since each Impact Team is focused on creating strategies to support and promote business outreach and financial education to a specific community group, their goals and efforts target a narrower pool of community members.

Our Impact Teams partner with members of the External Affairs team and local organizations to serve our diverse communities across our markets.

2024 Impact Team Highlights:

- In California, our Women’s Forum Impact Team teamed up with the Danville Area Chamber of Commerce to host a Business Owner/Financial Management Seminar as part of the Chamber’s Women’s Enterprise Initiative program.
- Our Texas and California South Asian Indian and Asian Pacific Islander chapters within the Asian Impact Team hosted Diwali celebrations for our customers and members of the community.
- Through our Texas chapter of the Mi Gente - Hispanic Impact Team, we supported women small business owners and entrepreneurs by sponsoring the Social Chica’s third annual La Poderosa Conference’s Fast Pitch Contest.



\$649 million

in closed business related to Comerica’s Impact Teams (IT) in 2024

African American IT

CA, MI, TX

Asian IT

CA, MI, TX

Mi Gente - Hispanic IT

CA, MI, TX

Salam IT

CA, MI

Veteran Leadership IT

MI

PRISM - LGBTQIA+ IT

CA, MI

Women’s Forum IT

CA, MI, TX

CA - California TX - Texas MI - Michigan

“Our Impact Teams embody our A Force for Good Core Value — they are our boots on the ground striving to ensure we are doing what’s right across the communities we serve. By providing business development and community outreach support, they continue to help us raise expectations of what a bank can be.”

LaToya Rowell
 Vice President,
 National Community Affairs Manager

Supplier Engagement

As a large national corporation, we rely on an ever-increasing network of business and supply chain partners to meet the needs of our customers. We believe an inclusive supply chain will provide the innovation, flexibility and adaptability we need to meet and exceed the expectations of our customers. We know a supply chain that reflects our customer base will better serve our customers, grow our business and build an even stronger organization.

Our Supplier Engagement strategy is based on four pillars:

- **ENGAGING** with suppliers in multiple markets and demographics,
- **INCLUDING** small businesses, veterans, persons with disabilities and other underutilized businesses in our sourcing opportunities,
- **SELECTING** the most capable and competitive suppliers, and
- **CULTIVATING** supplier relationships that drive economic growth.



Talent Outreach

Our colleagues are critical to our business success, and their success and well-being is a priority. Talent outreach is an integral part of our attraction and recruitment efforts, which include built-in fundamental practices to ensure talent pipelines exhaust all avenues to find the best and brightest. We work hard to attract and retain talent from all backgrounds. Our Talent Outreach Strategy delivers a qualified applicant pool reflecting the markets we serve.

At Comerica Bank, we believe in a Force for Good and investing in our communities and the future banking talent in our workplaces. We are a proud supporter of the Prairie View A&M University Banking Academy Program, which prepares students to become the future bankers in our workforce.

Administered by Prairie View A&M University's College of Business with the program led by Erick M. Kitenge, these students complete an additional three weeks of intense instruction at the conclusion of the spring semester. The students also complete the required necessary class credits as a part of the program. Additionally, they sit for the Credit Essentials exam administered by the Risk Management Association, receiving their certification at the end of the three weeks. This program enables banking partners like Comerica Bank to provide insight, mentorship and education, which improves the students' opportunities to secure internships and full-time opportunities with leading companies in the U.S.

Talent Outreach Networks

In addition to connecting with student organizations on college campuses and community-based organizations in our local markets, we have developed relationships and sponsored recruiting events with the following organizations:

- Employability
- Hiring Our Heroes
- Association for Latino Professionals in Finance and Accounting (ALPFA)
- Arab Community Center for Economic and Social Services (ACCESS)
- Hispanic Alliance for Career Enhancement (HACE)
- National Association of Black Accountants (NABA)
- Hispanic Association of Corporate Responsibility (HACR)
- Texas Southern University Future Bankers Leadership Program
- Prairie View A&M Banking Academy
- Texas State University McCoy College Banking and Financial Services Program

Community

“Being a good corporate citizen means more than just doing business — it means actively contributing to the well-being of the community we’re a part of. Whether through volunteer work, sustainable practices or supporting local initiatives, we have a responsibility to make a positive impact and lead by example.”

Brandon Q. Jones
Senior Vice President,
Director of External Affairs

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Community

At Comerica, we understand that thriving communities are vital to our growth and business success. We help build strong and sustainable communities by providing financial resources that expand affordable housing, fuel economic development, promote financial literacy and increase access to financing for individuals and small businesses. We partner with, volunteer with and donate to nonprofit organizations in the communities where we operate to help maximize our positive impact.

Our community reinvestment efforts and associated activities, including philanthropy, lending, community investments, volunteerism and data integrity, are led by Comerica's Director of External Affairs, Director of Community Development Banking and Director of CRA Governance and Reporting. In 2024, Comerica leadership received feedback and counsel from Comerica's national Community Development Advisory Council (CDAC) and three regional CDACs that consist of a total of 23 members representing communities across our national footprint. Comerica informs the CDACs on pertinent Community Reinvestment Act (CRA) and business strategies to ensure that Comerica is meeting the needs of low- and moderate-income (LMI) communities that need us the most.

2024 Key Pillars

Affordable Housing

- Support initiatives that develop and rehabilitate affordable housing, ensuring that more families have access to safe, stable homes.
- Leverage funding and technical expertise to help address housing affordability challenges by partnering with local governments and housing organizations.

Small Business Support

- Prioritize the power of local entrepreneurship as a catalyst for economic development and job creation.
- Focus on sectors that drive innovation and contribute directly to local supply chains, ensuring a robust economic ecosystem.

Community Revitalization

- Target underinvested areas to stimulate economic and social recovery through our revitalization initiatives.

Enhanced Community Services

- Strengthen community services that provide education, health and social support for residents beyond our financial investment.
- Help build or expand programs that improve literacy, workforce readiness, healthcare access and overall quality of life with our contributions.
- Align our services with local priorities in order to work alongside community stakeholders to enhance resilience and inclusivity.

Named one of The Civic 50's Most Community-Minded Companies for 10 years

Strengthening Our Communities

Our community investment strategy is built on a commitment to driving sustainable growth and creating positive change throughout the communities we serve. We focus our efforts on small business and community development lending programs, investing in tax credits for affordable housing, providing financial education and contributing time and money to causes and organizations we believe will positively affect our communities. Our strategy reflects a holistic commitment to improving lives. Through collaborative partnerships, innovative funding models and sustained engagement, we aim to create a framework where affordable housing, thriving businesses, revitalized neighborhoods and enriched community services work together to build resilient, vibrant communities.

- Comerica provided \$1 million in Community Development Financial Institutions (CDFI) investments in 2024.
- Comerica BusinessHQ™, which opened in May 2023, is a collaborative space established in Dallas-Fort Worth supporting small businesses in the underserved South Dallas footprint by providing individuals with no-cost coworking space and tailored technical assistance. The center served nearly 3,000 individuals in 2024.

In 2024, Comerica Bank originated 470 community development loans totaling approximately \$2.4 billion in the following categories:

- **Affordable Housing:** Financial education, loans or investments that support the development of rental or for-purchase housing, loans or investments that fund affordable mortgages or mortgage assistance programs and board or committee service that support the provision of affordable housing in LMI communities or for LMI individuals or families
- **Community Services:** Financial education, academic enrichment programs or resources, affordable childcare, workforce development/job training and affordable healthcare (including counseling), health/family services and education
- **Economic Development:** Activity for a Small Business Development Center (SBDC), Small Business Investment Company (SBIC), Rural Business Investment Company, New Markets Venture Capital Company, New Markets Tax Credit-Eligible Community Development Entity (CDFI) that finances small businesses or small farms, financing intermediaries that lend to, invest in or provide technical assistance to entrepreneurs, startups or recently formed small businesses or small farms, and providing technical assistance or supportive services, such as shared space, technology or administrative assistance to entrepreneurs, small businesses or farms
- **Revitalize and Stabilize:** Activities that revitalize or stabilize LMI geographies, distressed or underserved non-metropolitan middle-income geographies or designated disaster areas

2024 Community Development Loans by Purpose

Loan Purpose	Number of Loans	Sum of Loan Amount (Millions \$)
Affordable Housing	35	208
Community Services	27	54
Economic Development	404	2,070
Revitalize and Stabilize	4	24
Grand Total	470	2,356

To maintain high levels of engagement and to gather feedback related to community and economic development, we meet with our CDACs in our major markets to address the prominent challenges under-resourced communities are experiencing. These community and nonprofit leaders assist us in advancing our framework and strategy to maximize our impact in the communities we serve. For Community Reinvestment Act (CRA) and fair lending information, please view the [Fair and Responsible Banking](#) portion of the Responsible Business section.

Investing in Neighborhood Revitalization and Small Businesses

To support the small businesses and entrepreneurs that make up the backbone of local economies, Comerica provides investments to CDFIs and Minority Deposit Institutions (MDIs) in the markets we serve. We also look for opportunities to fund organizations who provide technical assistance and financial education to entrepreneurs and small businesses. For more specifics on small business support, refer to our [Small Business Support](#) portion of the Customers section.



Small Business Education Series

In 2024, we invested in the continuation of a collaborative partnership with the Dallas Black Chamber of Commerce to perpetuate the success and growth of small business across Dallas and Tarrant County, Texas. Through this partnership, we were able to serve over 300 small businesses to ensure they are equipped with the appropriate education, connections and capital to take their business to the next level.



Community Development Lending & Investing

The Community Development Banking team provides critical lending and investments to underinvested communities to support affordable housing, small business capital, revitalization and stabilization and community services. The impact of these investments aligns with our Outstanding rating on our CRA efforts.

In 2024, Comerica invested approximately \$120 million in Low Income Housing Tax Credit (LIHTC) equity for construction of affordable housing projects. We also seek to invest in projects that support sustainability, the arts and other social benefits.

\$318 million

in lending and investment to support affordable housing in 2024

At Comerica, we strive to be more than just a bank. We are a trusted partner deeply rooted in the communities we serve. Strong communities remain the foundation of long-term success that expand access to affordable housing, empower individuals and families, and transform neighborhoods into thriving, vibrant places to live and work. That is why Comerica remains dedicated to serving as a catalyst for progress. Through strategic investments in affordable housing, small business capital, community revitalization and stabilization, and enhancing community services, we provide solutions to build a brighter future for all members of our community.

Beatrice Kelly
Senior Vice President,
Director of Community Development Banking

Investing in the National Equity Fund, Avalon Nonprofit Housing

The National Equity Fund leverages LIHTC equity to invest in affordable housing and create innovative, collaborative solutions that increase access to developments that support individuals and families reaching their full potential. The \$5 million of LIHTC equity, along with a \$9.2 million construction loan provided by Comerica, will help build the first all-electric, 63-unit development serving homeless individuals in Ann Arbor, Michigan.



“Avalon Housing is deeply committed to advocating for, investing in and creating sustainable housing solutions that support our community’s most vulnerable members, providing long-term resources to address and prevent homelessness. Our community lending and investment commitment to the transformative 121 Catherine Street complex in Ann Arbor helps further Avalon’s mission to create healthy and safe units, affordable to economically disadvantaged individuals and families. Through partnerships like this, Comerica Bank advances access to sustainable affordable housing, which empowers individuals to thrive and contributes to the overall well-being of the communities we are privileged to serve.”

Michelle Lemerond

Senior Vice President and Group Manager,
Community Development Investments

Financial Education

Our Corporate Responsibility Platform includes a commitment to invest in financial education for under-resourced communities because we understand that Comerica thrives when our customers and communities are informed.

Financial education and technical assistance training are the fundamentals of our robust community and economic development programming to help strengthen and empower our economy and local communities. We provide financial education opportunities for young learners, students, adults, entrepreneurs and small business owners.

~102,000 **4,300+** **6,217**

LMI individuals took part in Comerica \$ense financial education programs with community nonprofit partners supporting adults, seniors, youth (including pre-K to 5th grade) and young adults.

In-person, virtual and hybrid Comerica Business \$ense workshops were activated by External Affairs across our national footprint providing technical assistance and entrepreneurial training serving nearly 100,000 small businesses across the country.

Individuals and entrepreneurs were served through Comerica BusinessHQ programming offering technical assistance training, small business support and resources for access to capital.

In 2024, Comerica's Financial Education Brigade (CFEB) continued to meet the needs in LMI communities for financial literacy and technical assistance training for small businesses. Comerica colleagues who actively served as CFEB members remained committed to aptitude training for financial inclusion in LMI communities in the markets we serve. Read more on these activities in the [Financial Inclusion](#) portion of the Customers section.

Economic Development and Small Business

In 2024, the American Bankers Association recognized Comerica Bank for its impact in supporting Southern Dallas small business and nonprofits through Comerica BusinessHQ. BusinessHQ earned the Community Commitment Award in the category of Community & Economic Development. Comerica BusinessHQ was launched in 2023 to provide integral services and value to small businesses in the Southern sector of Dallas. Through a mix of coworking spaces, incubation fellowships and technical assistance, Comerica BusinessHQ addresses the three essential needs of aspiring small businesses: capital, cultivation and connectivity. In addition, Comerica Bank partnered and invested with Community Development Financial Institutions around the country to continue deploying access to capital for small businesses and entrepreneurs who may not fit the profile for traditional banking products and services. Through the investments coupled with our Business \$ense Bootcamp™ programs, we are proud to have expanded access to increase small business participants by 120%.

Business \$ense Bootcamps

In 2024, Comerica Bank continued to host Business \$ense Bootcamps across its national footprint through funding and human capital. The Comerica Bank Business \$ense Bootcamp program model is designed to provide resources and industry training by subject matter experts to encourage and empower aspiring small business owners and entrepreneurs to remain competitive and thrive in today's modern economy. Bootcamps were offered in single sessions, multi-sessions over a course of four to eight weeks and on a recurring monthly basis. The bootcamp programs were offered in-person, virtually or hybrid to help meet the needs of small business owners and to provide flexibility. Bootcamps were structured to provide technical assistance training to small businesses covering the importance of individual and business credit, access to capital, business banking, managing cash flow, developing marketing plans, risk management and more.

Beyond our bootcamp offerings, Comerica provided philanthropic investments to nonprofit organizations committed to providing financial education and empowerment in hard-to-reach communities through partnerships with nonprofits, such as Dream Spring CDFI, Working Solutions CDFI, Riviera Beach CDC, Greater Pontiac Community Coalition, Michigan Black Business Alliance, Koreatown Youth Community Center and Chicanos Por La Causa.

Volunteerism and Philanthropy

Volunteerism

Comerica regularly partners with nonprofit and community organizations to improve financial education and support other community needs. The financial commitments made to strengthen local communities in 2024 were matched by the efforts of our colleagues, who devoted their time and expertise to support local nonprofits. Our colleague volunteer programs help drive Comerica’s success in improving the lives of individuals, groups and communities where we do business by building and managing relationships and strategic partnerships. Our colleagues 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.



84,365

volunteer hours
across all markets in 2024



Approximately

= \$2.8 million

worth of donated time



Volunteer Goals

Colleague volunteer activities in each primary market are overseen by a Local Community Involvement Coordinator, who works with our National Community Affairs Manager to ensure that volunteering goals are met, and we follow best practices in delivering on our commitments. In each of our markets, we set annual goals for volunteer hours. Our corporate-wide volunteer goal accounts for eight hours per colleague, representing a goal of 65,000 hours for 2024.

To support the communities where Comerica does business, we offer eight hours per full-time colleague and four hours per part-time colleague of paid time off for community volunteer work. Colleagues can choose volunteer opportunities organized by Comerica or volunteer work personal to the colleague. In 2024, 4,174 Comerica colleagues volunteered in their communities, achieving 84,365 volunteer hours, which translates to approximately \$2.8 million worth of donated time. The 2024 volunteer goal was exceeded by nearly 130%.

We believe colleagues at all levels of our organization gain valuable and relevant community insight through volunteer activities. We ask that our senior officers complete at least three hours of CRA-qualified volunteer hours as part of their annual performance plans.

2024 Volunteer Hours by Primary Market

Market	Total Colleague Volunteer Hours
Michigan	50,258
Texas	19,664
California	9,892
Other Markets/North Carolina	2,676
Florida	1,203
Arizona	672

Volunteer Activities: Comerica Cares

In addition to the time volunteered at local nonprofits, our colleagues also donate time to many of our community-focused programs, including Business \$ense Bootcamps and Comerica \$ense financial education programs. Many of these Comerica programs involved close coordination with local nonprofit partners.



2024 Comerica Volunteer Activity Examples

Texas:

- Our Austin colleagues volunteered to help local middle and high school students navigate the real world of personal finance as they assumed the role of “adult for the day” at Junior Achievement of Central Texas’ JA Finance Park.
- Dallas colleagues served as volunteer coaches for more than 90 Desoto ISD students participating in Network for Teaching Entrepreneurship (NFTE)’s World Series of Innovation Day at our Comerica BusinessHQ.
- More than 80 colleagues teamed up with the Visiting Nurse Association of Texas to deliver nutritious meals to more than 650 seniors and adults with disabilities in Dallas County.

Michigan:

- More than 30 colleagues helped refresh areas of the Detroit Lions Academy by updating landscaping, fresh flowers, picnic tables and raised garden beds.
- Over 80 colleagues gave their time to support Comerica’s Belle Isle Clean-Up Day and Belle Isle’s 120th Birthday Celebration.
- Our Michigan colleagues volunteered to conduct bilingual skills for careers in the finance industry workshops with La Casa Amiga Community Programs and Legal Clinic.

National:

- During back-to-school season, Comerica colleagues helped to provide over 1,800 backpacks, 500 water bottles, 500 piggy banks and nearly 2,000 sets of school supplies to children and families in need.
- Comerica colleagues positively impacted more than 2,000 children and their families during our Día del Niño “Children’s Day” educational events across our footprint.

Philanthropy

Our philanthropic approach is guided by our vision of successful customers, colleagues and communities and our Force for Good Core Value. By using our dollars to address social, economic and environmental challenges in our communities, we hope to drive positive change and long-term sustainable value for our company, stakeholders and communities.

Comerica Giving Priorities

Education: Provide support to programs that provide financial, business-focused and science, technology, engineering and math (STEM)-related education support for LMI individuals and families as well as college scholarships for studies in business, finance and STEM fields.

Economic/community development: Provide support to programs that promote and enhance opportunities for LMI families and communities through economic self-sufficiency; job creation, training, readiness and retention; neighborhood/community revitalization and business development; small business training and development; and affordable housing advocacy and development.

Human services: Provide support to programs that enhance and protect the health and well-being of LMI individuals and families, including transitional and supportive services and housing, hunger alleviation and food access.

“Being “A Force for Good” is not just a Comerica Core Value, it’s an altruism that resonates to the character of being the best version of yourself to all.”

Antoinette Frost
AVP, Flood Insurance Manager



How Comerica and Our Colleagues Give



Comerica Charitable Foundation

In 2024, the Comerica Charitable Foundation (a separate 501(c)(3) organization) and Comerica Bank committed over \$9 million in grants and charitable contributions to support economic and community development, enhanced health and well-being and educational support for LMI individuals and communities. These initiatives represent our deepened commitment to creating sustainable, community-focused solutions that promote equity and opportunity.



Comerica Bank



Colleague Giving Programs/Fundraisers

In 2024, Comerica colleagues committed approximately \$1.8 million to the United Way and recorded over 14,000 volunteer hours across our communities during our 2024 United Way campaign. We also conducted fundraisers that raised another \$59,409 for the organization.

Based upon the nature of the charitable request, support is either provided through Comerica Bank or the Comerica Charitable Foundation. The Comerica Charitable Foundation invites organizations to make program-related grant proposals online during four grant seasons. Comerica Bank provides support to charitable organizations through event sponsorship within our key market areas and accepts online charitable sponsorship requests year-round.

We support charitable organizations in our primary market areas of Arizona, California, Florida, Michigan, Texas, the Southeast market and Mountain West Colorado markets. Requests received from organizations in these areas are reviewed to determine if the goals and/or programs align with one or more of our giving priorities.

We also support market-specific fundraisers involving and chaired by colleagues. In Michigan, Texas and California, 2024 fundraisers supported the American Heart Association Metro Detroit Heart and Stroke Walk/Run, the United Negro College Fund Detroit Walk for Education, the American Cancer Society Making Strides Against Breast Cancer, Susan G. Komen and AbilityFirst.

Comerica Bank and the Comerica Charitable Foundation have an [Anti-Discrimination Charitable Giving Policy](#). For more information, visit [Comerica Charitable Giving on Comerica.com](#).



To amplify our giving priority to assist LMI individuals and families, we have established strong partnerships with charitable 501(c)(3) organizations within our markets through financial, in-kind and volunteer support and regularly look to them for opportunities where we may assist.

nfte!

Network for Teaching Entrepreneurship

Support for Network for Teaching Entrepreneurship (NFTE)

In 2024, we announced the expansion of our regional partnership with the Network for Teaching Entrepreneurship (NFTE) to multiple markets within its geographical footprint. Our \$100,000 investment provided entrepreneurship education programming to more than 25,000 middle and high school students in under-resourced communities who participate in NFTE’s Aspiring Entrepreneurs Program in California, Florida, Michigan and Texas.

The expanded partnership also allowed us to serve as a World Series of Innovation Challenge sponsor, which introduces young people to the United Nations Sustainable Development Goals and gives them an opportunity to explore ideas of social and environmental justice while using entrepreneurial skills to develop solutions to the most serious challenges facing humanity.

In honor of National Volunteer Month, NFTE recognized Comerica as one of its top five corporate partners — the nonprofit’s fourth most-engaged supporter globally this school year.

Environment

“Comerica’s 175-year history speaks to our ability to understand long-term vision while addressing near-term needs. We approach environmental issues like climate change with that same understanding — knowing that our future success depends on the actions we take today.”

Scott Beckerman
Senior Vice President,
Director of Corporate Sustainability



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Environment

Protecting and preserving the environment is important to the health and well-being of the people, businesses and communities we serve. As a bank, Comerica is uniquely positioned to help address environmental challenges and support sustainability initiatives across our entire value chain.

We recognize the impact we have through our customer relationships, and we believe the best way to meet the needs of a greener economy is to work with our customers. Comerica is committed to helping them adapt to a changing business and planetary climate in support of their own sustainability goals. We are also committed to reducing our environmental footprint and were one of the first U.S. regional banks to pledge to reduce our Scope 1 and 2 emissions 100% by 2050.⁶ As of year-end 2024, we reduced these emissions 61% compared to 2012. Beyond our own and our customers' operations, we have several programs in place to drive sustainability awareness for our suppliers and colleagues.

Climate Change

Comerica's Corporate Responsibility Platform includes a commitment to address climate change because we understand that a changing climate can create conditions that impact our organization and our customers.

We recognize some stakeholders identify climate change as a significant risk and are seeking to better understand how companies, including banks, are assessing these risks. Our key climate-related priorities are composed of both inward- and outward-facing aspects, to build on the 17 years of progress of our sustainability program.

Supporting Customers	Integrating Climate	Reducing Our Emissions Footprint
We are committed to working with our customers to meet their evolving needs in a greener economy.	We will work to integrate climate matters into our strategy, lines of business and approach to risk management.	We continue working to reduce Comerica's associated GHG emissions.



⁶ When Comerica's 2050 operational emissions reduction goal was initially set, it was a 100% reduction of our Scope 1 and 2 real estate-related GHG emissions from 2012 to 2050, which covered 99% of our Scope 1 and 2 GHG emissions. In 2021, we extended our goal to include our Scope 1 travel GHG emissions so that all Scope 1 and 2 GHG emissions are included in the goal.

Climate-Related Commitments and Reporting

Comerica has a significant history of sustainability and climate-related engagement, including reporting to CDP, publishing TCFD reports and providing information on environmentally beneficial lending. This legacy also well positions Comerica for future climate-based regulatory disclosures. Below are select climate-related highlights from our program history.

2008

Corporate Sustainability Office established

Environmental Policy Statement developed

2009

First Sustainability Report published

First CDP response issued

Established Green Procurement working team

2010

Enterprise Risk Committee of the Board begins oversight of Sustainability

First disclosure on green lending

2011

First GHG reduction goal established (15% vs. 2008 baseline)

2012

Environmentally beneficial (green) loan tracking system launched

First GHG Emissions Inventory Management Plan

First third-party verification of Scope 1 and 2 GHG emissions

2013

First generation GHG reduction goal met

2014

Established second GHG reduction goal (20% vs. 2012 baseline)

2015

Master of Sustainability Awareness Program launched

2016

Second generation GHG reduction goal met

2017

Climate Leadership Award for Excellence in Greenhouse Gas Management

Master of Sustainability Awareness Program expanded to all colleagues

2018

Established current GHG reduction goals (50% by 2025, 65% by 2030, 100% by 2050 vs. 2012 baseline)

First TCFD-aligned responses in CDP questionnaire

2019

Received second Climate Leadership Award for Excellence in Greenhouse Gas Management

2020

Comerica joins PCAF

Third GHG reduction goal met (50% by 2025)

Comerica's Corporate Responsibility Platform includes addressing climate change

2021

GHG emissions inventory covers 100% of supply chain

Established Office of Corporate Responsibility (now called Corporate Affairs)

2022

Comerica establishes Renewable Energy Solutions group

Green loans exceeded \$2 billion for the first time

Inaugural TCFD Report published

2023

First PCAF-based disclosure on financed emissions

Developed preliminary Climate Risk Framework

2024

Green loans exceeded \$3 billion for the first time

Scope 1 and 2 emissions reduction of 61%

Published second financed emissions disclosure

Environmental Policy Statement Commitments

Climate



- Measure, report and reduce our greenhouse gas (GHG) emissions
- Evaluate climate-related risks
- Increase awareness of climate-related matters with customers, suppliers and colleagues
- Seek profitable opportunities to provide climate-related products and services
- Support public policy approaches that harness the power of markets to create and implement cost-effective climate solutions

Resource Conservation



- Implement initiatives to reduce, reuse, recycle and rethink processes to decrease use of natural resources and generation of waste
- Reduce our energy, paper and water consumption
- Construct new banking centers in ways consistent with our commitment to environmental stewardship
- Seek profitable opportunities to provide financial products and services to customers that promote energy conservation and efficiency, water conservation, waste reduction and other environmentally beneficial business practices
- Promote awareness among customers, colleagues and suppliers of opportunities to minimize use of natural resources and generation of waste

Transparency and Accountability



- Provide colleague awareness training to ensure policy is implemented throughout company
- Establish systems and procedures to track and assess performance and publish external reports
- Periodically engage with external stakeholders for feedback on our sustainability performance



Reducing GHG Emissions

In 2011, we announced our first GHG emissions reduction goal, and in 2018, we were one of the first U.S. regional banks to pledge to reduce our Scope 1 and 2 emissions by 100% by 2050.

Though not “net zero” goals, our GHG reduction goals have been instrumental in guiding our progress. Reducing energy consumption is key to minimizing our Scope 1 and 2 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 also important to our bottom line as energy is a significant operating expense.

Reduction of GHG Emissions and Energy Impacts

To guide our environmental strategy and help us reduce Comerica’s carbon footprint, we have established quantifiable and measurable GHG emissions goals.

Progress	Goals
As of 2024 year-end, we have achieved a 61% reduction in Scope 1 and 2 GHG emissions⁷ against our 2030 goal and have already exceeded our 2025 goal of a 50% reduction.	<p>65% reduction of 2012 base year Scope 1 and 2 GHG emissions by 2030;</p> <p>100% reduction of 2012 base year Scope 1 and 2 GHG emissions by 2050</p>



Scope 1 and 2 GHG emissions

Our Corporate Real Estate team, along with their external partners, manages our real estate-based Scope 1 and 2 GHG emissions goals and energy use. In 2024, we continued to take key actions toward achieving our goal to reduce our Scope 1 and 2 GHG emissions:

- Implemented a tiered energy reduction program to match data center load as that load decreased through virtualization
- Actively managed building heating and cooling throughout the year to maximize the use of natural conditions and minimize mechanical heating and cooling
- Added high-efficiency lighting during select building upgrades

Moving forward, we are evaluating resetting our baseline year from 2012 to 2025, reflecting recent significant changes to our real estate portfolio. We are also evaluating updating our goals to reflect the impact of our reductions in market-based Scope 2 emissions.

⁷ Includes Scope 1 and 2 location-based emissions.
⁸ tCO₂e = metric tons carbon dioxide equivalents.
⁹ The location-based emissions base year of 2012 was used as a proxy for market-based since a market-based emissions base year was unable to be calculated.

Emissions Type	Base Year	Base Year Emissions	2022	2023	2024
Scope 1 GHG Emissions (tCO₂e)⁸					
Direct emissions from fuel combustion and refrigerant leakage (real estate and travel)	2012	6,950	6,242	5,682	5,391
Scope 2 GHG Emissions (tCO₂e)					
Scope 2 location-based GHG emissions	2012	74,784	28,804	29,221	26,749
Scope 2 market-based GHG emissions⁹	2012	74,784	29,699	25,570	22,710

Improving Our Renewable Energy Efforts

Comerica contracted with our primary electricity supplier in Texas to provide Renewable Energy Certificates (RECs) associated with our electricity consumption beginning mid-year 2023. In addition, we contracted with our primary electricity supplier in Michigan in a similar way beginning in 2026.

By adopting programs such as these, we are helping to support the renewable energy markets while also limiting our market-based Scope 2 emissions. Our 2024 Scope 2 market-based emissions are 15% lower than the location-based emissions, reflecting the impact of the renewable energy RECs. When using Scope 2 market-based emissions, our overall GHG emissions reductions increase to nearly 66% compared with our 2012 base year.

We also conducted research in 2024 to understand other potential renewable energy opportunities across our key markets. We established our renewable energy strategy, which will align with our relationship-based approach to business by prioritizing:

- In-market solutions nearest the communities in which we do business
- Longer-term solutions
- Attractive cost, complexity and risk profiles

Scope 3 GHG emissions

Comerica calculates our relevant Scope 3 emissions categories, many of which we have tracked and publicly reported for over 10 years. These emissions represent those from our supply chain, business travel and employee commuting, among others.

Financed Emissions

In 2020, Comerica was one of the first U.S. regional banks to join the Partnership for Carbon Accounting Financials (PCAF), a financial services industry-led partnership of nearly 600 financial institutions working to facilitate a consistent and transparent approach and framework to assess and disclose GHG emissions associated with loans and investments (Scope 3 Category 15). This partnership supports our progress in developing approaches and methodologies for calculating financed emissions and is intended to improve the availability of industry data for all participants. Comerica also co-chaired the external PCAF business loans workgroup.

Given the significance of Comerica's commercial lending operations, we have focused our financed emissions disclosure on the Business Loans and Unlisted Equity asset class as defined by PCAF. This represents a significant portion of our total loan portfolio. For transparency, we have elected to disclose not only the emissions associated with more commonly reported GHG-intensive industries, but rather our entire business loan portfolio. We expect these Scope 3 emissions estimates will continue to vary over time as data quality and methodologies continue to change and evolve. For details on our approach to financed emissions in the PCAF Business Loans asset class and our financed emissions methodology, review our [2023 Financed Emissions Update Report](#).

Please refer to our [GHG emissions verification declaration](#) for our current 2024 emissions totals. For more details on our GHG emissions progress, review our [Environment Key Metrics Table](#), our [most recent CDP Response](#) and our [Financed Emissions Update Report](#).

Emissions Type	Base Year	Base Year Emissions	2022	2023	2024
Scope 3 GHG Emissions (tCO₂e) – Relevant Categories					
Category 1					
Purchased Goods and Services	2021	65,115	64,213	80,117	64,228
Category 2					
Capital Goods	2021	3,953	3,846	4,497	3,483
Category 3					
Fuel and Energy-Related Activities	2014	4,302	1,566	1,387	1,147
Category 4					
Upstream Transportation and Distribution	2021	4,064	3,649	1,158	769
Category 5					
Waste Generated in Operations	2014	914	402	391	381
Category 6					
Business Travel	2014	4,147	2,389	3,213	2,587
Category 7					
Employee Commuting	2014	33,200	16,953	18,846	19,175
Category 13					
Downstream Leased Assets	2014	1,869	502	283	251
Category 15					
Investments ¹⁰	2019	10,862,285	9,571,941	9,058,233	9,741,822
Other Downstream					
	2014	272	211	232	238

¹⁰ We focused our emissions estimate on the Business Loans Asset Class, which is generally consistent with Comerica's commercial loan portfolio and accounted for 92% of Comerica's total loan portfolio as of December 31, 2024. This emission estimate covers 58% of total on-balance sheet assets as of December 31, 2024.

Reducing Paper, Waste and Water Impacts

In addition to GHG emissions and energy reductions, our operational environmental sustainability efforts include paper, waste and water reduction.

Comerica tracks progress across several environmental key performance indicators such as paper consumption, waste generation and water use. We analyze the results and trends from these metrics and share them with key decision-makers and our facilities management and engineering teams to keep them informed of our facilities' performance. This data informs action, as appropriate, to help ensure that we continue reducing our environmental footprint and meet our environmental sustainability commitments. For more environmental metrics, view our [Environment Key Metrics Table](#).

2024 Paper Progress

89% decrease

in office copy paper from our 2012 base year

Paper

Our Corporate Procurement department tracks paper purchases across the company on an annual basis, including office copy paper, envelopes, rolled paper, statements, letterhead, marketing brochures and business cards. We continue to focus on implementing technology enhancements and educating colleagues about ways to reduce paper consumption.

In 2024, we continued restricted printing to in-office only and continued messaging to reduce paper consumption as colleagues returned to the office. Our preference remained for office copy paper purchases that are FSC-certified and contain post-consumer recycled content.



2024 Waste Progress

41% decrease

in waste to landfill from our 2012 base year

Waste

Our Corporate Real Estate team, along with their external partner, tracks landfilled and recycled general office waste through our corporate-wide waste vendor on an annual basis. Annual waste totals are also gathered from our vendors that manage the recycling of electronics, paper and universal waste.

The total amount of standard operational waste that was landfilled decreased in 2024. We also centralized operations from several large office buildings and provided those workers with new computers and other electronic equipment. This resulted in an increase in recycled electronic waste (70 tons in 2024 versus 24 tons in 2023), which was repurposed or recycled through our electronic waste management vendors.

2024 Waste and Recycling Metrics

1,147 tons

of office paper recycled

70 tons

of electronic equipment recycled or repurposed

53%

of total waste diverted from the landfill

2024 Water Progress

48% decrease

in metered water use compared to our 2012 base year

Water

Water stewardship is important as we operate in water-stressed regions as well as in communities with an abundance of water. Our approach continues to focus on efficiently using this important resource and closely monitoring consumption and costs. Our water usage is primarily split between two activities: domestic (interior) use and landscape irrigation. Our Corporate Real Estate team, along with their external partner, tracks water consumption through metered utility bills.

We track water consumption by evaluating water bills for any anomalies in consumption or spend, which may indicate leaks or theft. At times, this is difficult due to billing frequency from local utilities and delays in actual meter readings. To overcome this data gap, team members from Corporate Real Estate and our external partners have placed greater focus on water waste in the last few years.

In 2024, we saw an 18% decrease in water usage compared to 2023. A significant part of this was our reorientation of buildings in Southeast Michigan. We sold two large office buildings in 2024, moving those operations and colleagues to a single location in Farmington Hills.

These steps toward greater efficiency included the following:

- Further shrinking the seasons for our irrigation systems, including winter shutdown of irrigation systems in Texas for the first time
- Enhanced awareness of irrigation leaks by field teams
- Increasing oversight of water billing to identify leaks

Sustainable Landscapes Playbook

Across Comerica's building portfolio, roughly 80 million gallons of water are consumed each year for indoor and outdoor purposes. It is estimated that roughly half of that consumption goes toward irrigation. In efforts to reduce our water footprint, we partnered with our external Real Estate partners to develop and adopt a new sustainability standard focused on outdoor water efficiency. Published as "The Sustainable Landscapes Playbook," this standard specifies native and drought tolerant palettes of plants, trees and shrubs that will transform our retail banking centers outdoor aesthetic and function over time. Landscape designs that utilize and promote native vegetation can dramatically reduce and even eliminate the need for irrigation, which is the primary focus of the Playbook. Additionally, native plants tend to require less fertilizer and chemical pesticides, while providing food and shelter for native animals and insects. Comerica Bank's Sustainable Landscapes Playbook addresses and includes the following features in support of a more sustainable future:

- Reduced outdoor water consumption and spend
- Native vegetation that is drought tolerant, pest resistant and low maintenance
- Regionally uniform outdoor aesthetic
- Irrigation system optimization
- Safety and security
- Compliance with city and state requirements



Comerica Shred Days Support Privacy, Recycling and Food Banks

Comerica's Shred Days support our local communities by collecting paper records and sensitive documents and shredding them securely as well as collecting food and donations. These free events help reduce fraud and identify theft, recycle hundreds of tons of paper and address hunger in our communities. Our highly visible and successful events provide us an opportunity to enhance our brand awareness, educate the public and engage with our colleagues and local communities.

Since 2008, we have securely shredded over 7 million pounds of paper and organized the donation of the equivalent of over 1.6 million meals to local food banks within our Shred Day markets.



COMERICA SHRED DAYS (Dallas, Houston, metro Detroit)	2024
Number of vehicles serviced	4,413
Paper securely shredded (pounds)	434,400
Food donations (pounds)	14,338
Food donations (\$)	37,373
Total meals donated based on quantity of food and monetary donations	137,285
Electronics recycled (pounds)	16,675

Reducing Environmental Risk Through Credit and Lending Practices

Our credit and lending decisions and relationships are guided by our corporate credit policies and evaluated on the individual details of each borrower and transaction. In addition, we pursue certain lines of businesses and industries based on our ability to provide products and services using our specialized expertise. An example of this is our Environmental Services Group, which provides financial solutions to a range of companies, including those in the landfill, gas to energy, waste to energy, renewable energy and recycling businesses, that help reduce the physical risks of climate change. We have also implemented policies that require increased rigor and due diligence when we consider financing within certain industries or to higher risk customers.

Real Estate Lending Practices

Our Environmental Risk Management Group, within our Enterprise Risk Division, manages environmental risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate and minimize potential environmental risks associated with loans secured by real estate. Managing these environmental risks helps limit the economic, regulatory and reputational risks associated with taking real estate as collateral in a loan transaction.

Comerica follows Federal Reserve System and Federal Deposit Insurance Corporation (FDIC) guidelines that require lending institutions to have policies and procedures in place to manage environmental risk. We require our customers to comply with environmental laws that are covered in our lending agreements and monitor for environmental compliance when loans are originated and, depending on the individual credit risk profile, when certain loans are renewed. In some cases, we require follow-up assessments with borrowers and create agreements with them that establish specific outcomes and deadlines.

Our Environmental Liability Policy requires properties that are pledged as collateral to be evaluated for potential environmental liabilities of significance using standard and proprietary due diligence tools. In this way, Comerica supports the cleanup and reuse of industrial and commercial properties that have underlying soil and groundwater contamination.

Environmentally Beneficial (Green) Loans

By working with companies involved in environmentally beneficial industries and projects, we extend our impact well beyond our own footprint and advance issues such as recycling, sustainable energy, green buildings and pollution reduction.

Since 2012, Comerica has tracked environmentally beneficial (or green) loans within our commercial loan systems using 14 green loan categories.

- Green building (new or retrofit)
- Bio-fuels
- Recycling
- Bio-gas
- Energy efficiency
- Vehicle electrification, advanced batteries or fuel cells
- Brownfield redevelopment
- Smart grid technologies
- Wind energy
- Pollution control
- Solar energy
- Green engineering, consulting, evaluation or design services
- Geothermal, wave or tidal energy
- Other green products and services

\$3.2 billion

in loans and commitments coded to environmentally beneficial (green) businesses or projects at 12/31/2024

11% increase

in loans and commitments coded as green as of 12/31/2024 compared to 12/31/2023

Determining Green Loans

Inherently Green Company

More than 50%

of revenues attributed to green products or services

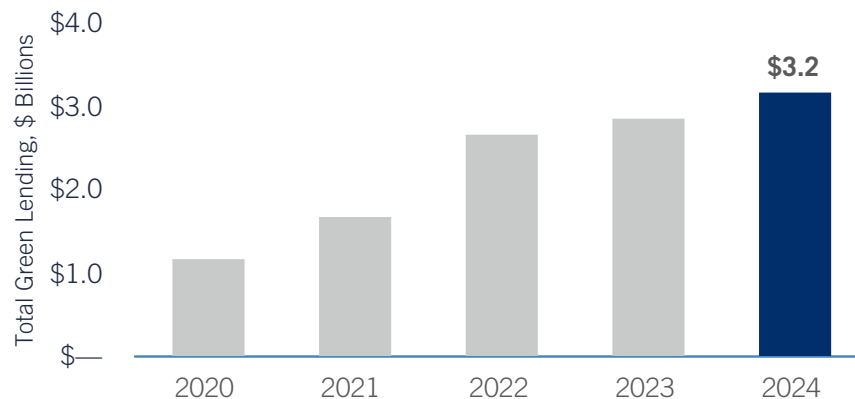
Use of Proceeds for Green Purposes

More than 50%

of loan proceeds dedicated to green purposes

To be counted as a green loan, a loan must be either for inherently green companies or companies that use a majority of loan proceeds for green purposes. We provide resources and guidance to help colleagues accurately code environmentally beneficial loans in Comerica's systems through on-demand, narrated training on our Comerica Sustainability intranet site.

Green Lending Progress



Dedicated Renewable Energy Solutions Group

Comerica formed a new group dedicated to growing and supporting its renewable energy business in 2022. An expansion of Comerica's Environmental Services Group, this team grew from Comerica's experience in financing landfill gas and biomass projects and has become a leader in renewable energy lending by understanding what drives the renewable natural gas, solar and wind industries.

Comerica provides financing for a full range of wind energy and solar energy projects including utility scale, distributed (residential rooftop) and community solar. The group's experience also supports the diverse needs of waste-to-energy businesses including landfill gas-to-energy, biomass and anaerobic digestion.

Our Environmental Services Group also partners with associations and nonprofits such as The Coalition for Renewable Natural Gas and the Environmental Research and Education Foundation to advance sustainability and improve industry practices.

Driving Sustainability Engagement and Awareness

Engaging Colleagues

Our voluntary Sustainability Awareness Program (MSA) is a cornerstone of our sustainability engagement strategy. Designed to teach colleagues about sustainability, the voluntary program shares resources and activities that support Comerica’s sustainable business strategy by bring sustainability to life for our colleagues. As of 2024 year-end, 935 Comerica colleagues were participating in the MSA Program.

The MSA Program is one of many ways we educate colleagues on sustainability along with internal communications and discussion boards, green teams, sustainability-focused workgroups and training. New hires are required to complete mandatory sustainability awareness training; 100% of Comerica’s new hires completed the course in 2024.

To further support sustainability action in our workplace and our colleagues’ personal lives, Comerica partners with organizations such as Ecochallenge.org to provide voluntary learning opportunities.

Ecochallenge.org provides learning and engagement opportunities on the topics of general sustainability, climate, health and social justice. In 2024, Comerica participated in two Ecochallenges with colleagues across our markets: the Earth Month Ecochallenge in April and the People’s Ecochallenge in October.

2024 Green Team Metrics

348

colleagues participating in market-based green teams

\$9,200

raised for local nonprofits during artwork sale organized by Michigan Green Team

150+

pairs of used eclipse sunglasses collected for donation to Astronomers Without Borders

Colleague-Led Green Teams

Comerica’s market-based Green Teams, located in California, Michigan and Texas, are composed of dedicated colleagues who organize year-round sustainability awareness and community involvement initiatives. Events in 2024 included environmental-related volunteering projects, virtual and in-person educational events, sustainability-related newsletters, member meetings and donation drives. Activities organized by Green Teams also supports colleagues participating in our MSA Program.



Comerica and Community Impact

Comerica continues to expand CoWork, a Corporate Real Estate initiative to help us reduce square footage and environmental impacts, benefit local nonprofits and community organizations, prioritize collaboration for colleagues and enhance technology to support focus and productivity. CoWork projects incorporate more ergonomic features, large-screen monitors and other wellness and environmentally beneficial technology. Three additional offices received CoWork renovations in 2024, for a total of 38 completed locations since September 2015.

CoWork provided Comerica with creative opportunities to reuse, repurpose and recycle surplus furniture, artwork, office supplies, carpeting, tile and other construction materials — reducing our total waste to landfills.

2024 CoWork Metrics

390

boxes of supplies and artwork donated to several nonprofit organizations

188

tons of construction materials recycled/diverted from landfills

73

U.S. tons of paper shredded and recycled as part of CoWork renovations

Sustainable purchasing choices have helped shape our office environment in our new spaces. Our CoWork spaces included features such as low volatile organic compound carpets, glue, paint, stain and millwork; LED lighting with energy reduction features; UL GREENGUARD-Certified products to reduce indoor chemical air emissions; hydration stations to reduce bottled water use; and solar shades to improve temperature control and colleague comfort.

Supporting Supply Chain Sustainability

As stated in Comerica’s [Environmental Policy Statement](#), we expect our suppliers to manage resources wisely. During the supplier sourcing process, Comerica’s Sustainability Office reviews products and services requested to determine potential sustainability risks or opportunities. The Sustainability Office coordinates with our sourcing colleagues to share recommendations, such as requesting options for sustainable product attributes or requesting additional supplier information to determine if risk mitigation is appropriate. In 2024, we reviewed 121 sourcing projects associated with more than 350 suppliers.

Our Green Procurement Team is composed of colleagues from Comerica’s Procurement Team, Corporate Sustainability Office and our Corporate Real Estate supplier. This team meets bimonthly to establish sustainability initiatives for Procurement, discuss best practices on engaging with suppliers and brainstorm sustainable solutions for our supply chain. The team also determines supply chain sustainability-related training topics and organizes trainings for procurement colleagues.

Supply Chain Sustainability Metrics

100%

of computers and displays with EPEAT ratings

85%

of flooring purchases containing recycled content

91%

of furniture purchases were BIFMA LEVEL® certified



Responsible Business

“For 175 years, Comerica has upheld its legacy as an institution built on integrity. We remain dedicated to preserving the trust of our customers, communities, employees and shareholders, by balancing risk with opportunities to support sustainable growth. Through our commitment to responsible business, we have strengthened our resilience by helping the company navigate challenges and adapt to changing environments.”

Curtis C. Farmer
Chairman, President and Chief Executive Officer

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Responsible Business

Our business is based on the trust of our customers, communities and entire value chain, and we are committed to earning and maintaining that trust through ethical operations and doing business the right way — with honesty, integrity and transparency. This commitment to responsible business is embedded in our Core Values and forms the foundation for the way we operate on a daily basis.

Beginning in 1849, Comerica has stood as a beacon of strength in our communities, focused on earning the trust and confidence of our colleagues, customers and stakeholders. Since then, we have worked to protect and enhance our brand and reputation as a leader in our industry, delivering a premium blend of service and value while ensuring transparency in our disclosures and reporting as well as our interactions with colleagues, customers, investors and other stakeholders. Increasingly, customers are interested in doing business with companies they admire and trust. By living our [Core Values](#), we put ourselves in a position to maintain our strong reputation in the financial services industry and the markets we serve.

Business Risk Management

With a consistent and conservative approach to banking, Comerica prioritizes effective risk management and oversight. It is critical to our growth, success and organizational resilience, enabling us to respond to evolving business trends, market demands and an increasingly complex regulatory environment. It also allows us to proactively respond to external threats and events, including risks and opportunities arising from various industry and market activities.

We continuously strive to improve and develop our risk management and oversight. While we assume various types of risk during the normal course of business, we work to understand, manage and carefully consider the risks we are willing to take and accept. In this way, we aim to appropriately balance financial performance targets with our corporate strategy, risk appetite, mission and Core Values.

Transparency is one of the most significant topics for our stakeholders and, as a result, one of our Impact Topics. As a leader in the financial services industry, we understand the importance of sound, verifiable data and visibility in our methods of disclosure. We provide robust financial, environmental and social reporting, using well-understood metrics to demonstrate our performance, progress and successes. We are committed to the implementation, control and maintenance of systems and procedures to obtain and verify information we disclose, including how we track and manage our sustainability impacts, risks and opportunities.

17

consecutive corporate responsibility-related reports

16

consecutive years responding to CDP's annual climate change questionnaire

12

consecutive years of third-party assured GHG data



Risk Management Oversight

Our governance structure is a multilayered approach that supports our enterprise risk management (ERM) framework. This framework provides guiding principles and recommended practices to ensure a consistent, holistic approach to risk management. It is composed of a governance structure overseen by the Board of Directors, which approves Comerica’s Risk Appetite Statement and outlines key risk management components, including the risk taxonomy, risk assessments, risk policies and our Three Lines of Defense.

The Board’s Enterprise Risk Committee (ERC) meets quarterly and is chartered to assist the Board in promoting the best interests of the Corporation by overseeing policies and risk practices related to enterprise-wide risk and ensuring compliance with bank regulatory obligations and applicable laws.

Internal Risk Management Committees, chaired by members of Executive Management with risk subject matter expertise, serve as a point of review and escalation for risks that may have material impacts, risk interdependencies or risk levels that may be nearing the limits outlined in the Comerica Risk Appetite Statement. These committees are composed of senior-level leaders who represent views from both the lines of business (First Line of Defense) and the Risk Division (Second Line of Defense).

The overall 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 identifying significant risks to our company. For more on risk identification and management, see our [2024 Annual Report](#).

Three Lines of Defense

First Line of Defense: Every individual at Comerica plays a role in managing risk to help achieve our strategic goals of the [Comerica Promise](#). All colleagues outside of Legal, Risk and Internal Audit are our first line of defense and are responsible for the day-to-day management and ownership of risks.

Second Line of Defense: Each of the major risk categories are further monitored and measured by specialized risk managers in our Risk Division. This second line of defense is led by the Chief Risk Officer and provides consistent processes and tools for how our business units identify, assess and manage existing and emerging risks, ensuring alignment of risk practices across the company and compliance with laws and regulations.

Third Line of Defense: Internal Audit monitors and assesses the overall effectiveness of the risk management framework on an ongoing basis and provides an independent, objective assessment of the Corporation’s ability to manage and control risk to management and the Audit Committee of the Board.

Key Components of ERM Framework Follow Primary Stages of Risk Management Lifecycle

Plan

Develop governance processes and structures that ensure risk management is systematic, comprehensive and aligned with Comerica’s objectives and risk appetite

Provide common framework, inventories and taxonomies across the enterprise

Identify

Identify and document risks that are reasonably expected to materially affect Comerica’s ability to achieve its business and strategic objectives

Maintain a comprehensive inventory of risks that might prevent or delay the achievement of objectives

Assess

Establish and execute processes to evaluate the severity and likelihood of risks on Comerica’s business and strategic objectives

Determine risk rating levels to guide effective risk management strategies



Manage

Define and execute risk management strategies, including maintaining a system of preventative and detective internal controls to mitigate inherent risks

Establish processes to address deficiencies in control design and effectiveness

Monitor

Establish and execute programs to ensure risk assessments are accurate and reflect the current business environment

Develop and execute testing strategies to validate the quality, reliability and effectiveness of controls

Report

Establish timely, transparent and standardized risk reporting for senior management and other key stakeholders

Use analytics to enable thematic risk reporting across business

Key Enterprise Risks

Risks we manage through our ERM Framework include:



Strategic

Risk of inadequate income/returns or loss due to impairment of reputation, failure to develop and execute business plans, failure to assess business opportunities and failure to identify appropriate return for risk taken



Compliance

Risk of failure to comply with applicable laws, rules or regulations that could result in regulatory comment or legal sanctions, regulatory fines or financial losses from legal events, including providing customer restitution



Operational

Risk of loss due to the inadequacy of or failures related to internal processes, suppliers and people or from external events, excluding those driven by technology



Model

Risk of loss or variability of returns resulting from decisions based on incorrect or misused model outputs/model estimates and reports



Market

Risk of financial loss due to adverse movements in interest rates, foreign exchange rates and commodity and equity prices



Liquidity

Risk that Comerica does not have sufficient access to funds or the ability to raise or borrow funds at a reasonable cost at all times



Credit

Risk to current or anticipated earnings or capital arising from a customer or counterparty's failure to meet the terms of lending/funding-related contracts or from a lack of portfolio or customer/counterparty diversification



Technology

Risk of loss or adverse outcomes arising from the people, processes, applications and infrastructure that support the technology environment

Supplier Risk Management

Our risk management framework extends to those who do business with us. We conduct initial and ongoing risk evaluations of our suppliers and perform due diligence reviews of potential suppliers based upon the scope of services to be provided and the potential risk to our organization. Click [here](#) to learn more about how we effectively manage supplier risk.

“Managing risk is less about reaching a finish line and more about maintaining a continuous improvement mindset.”

Teresa Randall

Vice President, Procurement Systems and Operations Lead

Enterprise Security

Comerica’s Enterprise Security Program is aligned with business imperatives, organizational risk and technologies to protect, monitor, detect and respond to the ever-changing financial services threat landscape. To do this, we focus on:

- Effectively managing cybersecurity risks for the organization and our customers
- Aligning resources into centers of excellence
- Maintaining standards and best practices in detection and response
- Continuously monitoring and improving our service performance

Our teams provide a comprehensive set of cybersecurity services within Comerica across data protection, cyber threat mitigation, risk management and fraud detection.

Our Enterprise Security Program includes our Cybersecurity Program, Corporate Physical Security Program and Business Continuity Program. It is administered by our Chief Information Security Officer (CISO) and Chief Operating Officer, who work closely with the Enterprise Risk Committee to monitor, improve and enhance the program in response to changing risk environments.

Mission and Guiding Principles

Our Mission:

The Enterprise Security Program drives resilience and supports a culture of risk understanding, leveraging controls and technologies to protect Comerica’s colleagues and assets to enable Comerica’s business objectives.

Goals



To Defend



To Protect



To Enable

The guiding principles of the Cybersecurity Program are:

- Focus on Solutions
- Seek to Educate and Learn
- Invest in People and Technology
- Take Ownership
- Cultivate a Shared Vision
- Support Business Objectives

Oversight and Governance

Enterprise Security uses a combination of strong Board oversight and executive leadership to perform effective governance. We take a cross-functional approach to ensure that we have an effective, evergreen Enterprise Security Program. The Board, primarily through the Enterprise Risk Committee, is kept apprised of the following by the CISO: overall status of the program, effectiveness of policies and procedures, material risk issues, risk management, control decisions and service providers.

Enterprise Security Functions

Business Risk and Control Office	Maintains effective risk and cybersecurity program management through identifying, monitoring, responding to and reporting risks and metrics, enabling the business by providing guidance and support to manage cyber risk.
Cyber Defense Operations	Provides capabilities to protect, monitor, detect, respond and recover from incidents, with efforts focused on effectively managing cyber risk.
Business Enablement Services and Engineering	Applies detailed security and technical information to drive cybersecurity and technology risk strategy. Includes cyber engineering and architecture, architecture and design, cyber risk management and the business security and risk champions sub-functions.
Identity and Access Management (IAM)	Drives the strategy, policies and procedures to support capabilities for IAM Governance, Identity Management, Privileged Access Management, Customer Identity and Access Management to meet business needs, reduce overall information security risk and improve the user experience.
Business Continuity	Manages organizational resources and skills sufficient for Comerica to provide ongoing financial support and services to customers during events that disrupt or impair the enterprise. Business Continuity is also responsible for coordinating the annual Business Continuity Program requirements.
Corporate Physical Security	Develops the enterprise physical security strategy, policies and standards that ensure the physical safety of all visitors, colleagues and customers at the bank’s facilities as well as the security of property and assets.

Cybersecurity

Comerica’s customers, colleagues, business partners and other stakeholders trust Comerica to protect their personal information and financial data, and we are committed to maintaining their trust. Our [Security Commitment](#) provides a high-level overview of the various methods, tools and processes Comerica uses to help keep customer accounts and information secure.

The Cybersecurity Program Charter, through the approval of Comerica Enterprise Risk Committee of the Board, assigns the authority of the Cybersecurity Program to the Comerica Bank Incorporated Technology Risk Committee and the CISO.

Enterprise Information Protection Framework



Framework Governance



Training and Awareness



Control Practices



Framework Maintenance



Information Risk Management



Policies and Standards



Monitoring and Testing

The Enterprise Information Protection Framework, managed by our Second Line of Defense, establishes the role of several other policies governing operational, technology and compliance risks along with behavioral expectations for protecting information at Comerica. These include but are not limited to Comerica’s Third-Party Risk Policy, Contract Administration Policy, Privacy Policy, HIPAA Policy and Corporate Physical Security Policies. Components of each of these policies are taken into consideration in the implementation of the Cybersecurity Program.

Cybersecurity Responsibilities

Board of Directors Oversees and holds senior management accountable for implementing an effective Cybersecurity Program and managing cybersecurity risks within Comerica’s relevant risk appetites

Receives regular updates (typically on a quarterly basis) from Comerica’s CISO

Enterprise Risk Committee of the Board Assists the Board in discharging its oversight duties and, along with the Board, periodically reviews and evaluates the performance of the program and its ability to appropriately manage risk

Reviews management responses to security incidents, including those involving identity theft or personal health information, and makes recommendations for program changes

Technology Risk Committee Provides executive management oversight and monitors the operational effectiveness of the program, along with ensuring corporate-wide implementation and oversight of the controls necessary to deliver the objectives of the Cybersecurity Program

Chief Information Security Officer Leads the Cybersecurity Program and is accountable for implementing, managing and monitoring the effectiveness of the cybersecurity strategy

Annually evaluates the strategy with First and Second Line of Defense executive leadership and technology executive leadership

Reports quarterly to the Enterprise Risk Committee of the Board and provides regular updates to the Board of Directors

Policies and Standards

Enterprise Security has a Technology Risk Management Policy that establishes the principles and guidelines for effective identification, measurement and appropriate management of cybersecurity and technology risks. The program is also aligned with industry standards such as National Institutes of Standards and Technology (NIST) and International Organization for Standardization (ISO) frameworks.

Monitoring and Mitigation

Enterprise Security evaluates the effectiveness of our framework and cybersecurity programs through adherence to the following best practices:

- Risk control self-assessments conducted by our business units, including regular stress-testing and scenario assessment processes for significant identified risks to Comerica
- Cybersecurity reviews by experienced industry professionals in addition to regular internal reviews
- Comprehensive evaluations carried out by external regulatory examiners
- Three Lines of Defense built on internal audits, oversight and effective challenge
- Maintenance of a continuous monitoring program
- Participation in several industry-wide initiatives to help keep us informed of new fraud trends and meaningful threat intelligence and to enable us to develop appropriate countermeasures

Training and Awareness

Comerica's colleagues are our First Line of Defense and are important to identification and awareness of security and risk issues. Comerica provides mandatory annual information security training, mobile device trainings and phishing intervention workshops. We review and update the courses each year to include relevant threats and topics. In 2024, all eligible employees and contractors completed the training.

2024 Cybersecurity Highlights

- Expanded our phishing training content and workshops
- Enhanced the content of our security and phishing awareness offerings
- Implemented an industry-leading cloud security platform
- Deployed an enterprise-wide intelligent email security solution
- Published new and updated existing cloud standards
- Established Comerica's Fusion Center, integrating Cyber Defense and Physical Security to foster more effective information sharing, visibility and response
- Continued to centralize identity and access management

Business Continuity

Effective business continuity and recovery management preparedness are crucial ways that Comerica proactively addresses potential risks to the business. From monitoring our systems for internal and external threats to monitoring Comerica locations for natural disaster or pandemic events, we strive to ensure the continuity of critical products and services provided to our customers as well as the safety and well-being of our customers and colleagues. We also recognize the impact of climate change and the potential for increased frequency and severity of storms and other natural disasters, further elevating the importance of our business continuity practices.

Our Business Continuity Management Program enables Comerica management to oversee and implement resilience, continuity and response capabilities to safeguard colleagues, customers and our products and services in the event of a disruption to regular operations. Our overall objective is to support operations at an acceptable level and recover within an acceptable time frame. To that end, we develop, maintain and regularly test our enterprise-wide continuity and disaster recovery plans that consider all critical elements of our business. We also prioritize business objectives and operations that are essential for recovery and ensure that our disaster recovery planning prepares for the recovery or continuation of technology systems and assets, infrastructure and applications that are critical to our business functions.

2024 Business Continuity Highlights

- Significantly enhanced Business Continuity Plan Liaison training using an industry recognized on-demand Video Training Series
- Successfully managed several significant disruptive events
- Successfully restructured the Business Impact Analysis and Business Continuity Plans for many business units to optimize organizational effectiveness
- Improved colleague awareness and preparedness for potential disruptive events through publication of enterprise-wide content
- 100% completion of all scheduled tabletop business continuity exercises and annual Training and Testing Requirements

Corporate Physical Security

Our Corporate Physical Security Program safeguards the integrity, confidentiality and availability of our organization's critical assets, information and resources. Comerica is committed to providing a secure and resilient environment for our colleagues, clients and other stakeholders. We also are committed to providing a safe and secure work environment in accordance with applicable employment, safety, health, anti-discrimination and other workplace laws. By maintaining a robust corporate security program, we aim to mitigate threats, prevent disruptions and foster trust in our operations, thereby enabling sustainable growth and ensuring the long-term success of our organization.

Corporate Security Team Key Duties

Risk Assessment and Management: Conducting regular assessments to identify potential security risks, evaluating their potential impact and implementing appropriate measures to mitigate these risks.

Physical Security Awareness and Training: Educating colleagues and stakeholders about security best practices, promoting a culture of security awareness and providing training programs to enhance their understanding of potential risks and the role they play in maintaining a secure environment.

Technical Security: Implementing measures to protect physical assets, including facilities, equipment and data centers. This involves managing access control systems, video surveillance, alarm systems and physical security incident response protocols.

2024 Corporate Physical Security Highlights

- Achieved “Successful” audit rating in 2024 audit review of security operations
- 100% completion of banking center security surveys and robbery awareness training
- Continuing to increase our security posture around ATMs
- Reviewed and updated all active security procedures

Privacy and Data Protection

Customer privacy and data protection are key topics critical to our business success. In addition to our Cybersecurity Program and Enterprise Information Framework that help protect against unauthorized access to customer data, we have a program designed to identify and mitigate compliance-related risks, including those for privacy. Additionally, information about what types of personal information we collect and how we collect, store and secure that information is available on our website and upon request through other channels.

Mission and Guiding Principles

Comerica is committed to maintaining customer privacy. We are guided by our Core Values and a detailed list of information-sharing principles, which include:

- Limiting the amount of personally identifiable information collected
- Holding colleagues to strict standards of conduct to ensure confidentiality
- Maintaining accurate customer information and responding promptly to customer requests to correct information
- Not selling or sharing customer information with third parties for marketing purposes, except as disclosed in our privacy notices and permitted by applicable law
- Maintaining a process for properly reporting privacy incidents or suspected privacy incidents

Oversight and Governance

Enterprise Risk establishes the framework for oversight and governance, which includes appropriate policies and procedures for data protection and privacy. In 2024, Enterprise Security published updated standards as part of the Corporate Information Protection Policy and Standards (CIPPS), which govern data protection. Additionally, cybersecurity controls are continually assessed, enhanced and introduced to support customer and enterprise data protection. Comerica's CISO is responsible for Data Security oversight.

Training and Awareness

Comerica addresses technological, physical and human risk by preparing our colleagues as a strong First Line of Defense who are key to identification and awareness of security and risk issues. Comerica provides mandatory annual information security and mobile device training as well as monthly phishing simulations and coaching. Mandatory formal training courses are updated annually to the current threat landscape and completion is required of all eligible colleagues. A dedicated Security Awareness and Communications team regularly provides awareness and educational opportunities to all Comerica colleagues through in-person events, gamified activities, expert panel discussions and frequent communications.

Compliance and Ethics

As one of the 25 largest commercial U.S. financial holding companies, we are committed to earning the trust and confidence of our customers, colleagues and stakeholders. We are focused on demonstrating the highest standards of ethics and integrity in everything we do. This commitment is founded in our Core Values and embedded in our culture. We provide our colleagues, senior leaders and Board of Directors with the tools and knowledge to take ownership of this commitment and to act with integrity and in compliance with all ethical and legal responsibilities.

Codes of Ethics

We maintain [Codes of Ethics](#) to instill an ethical culture at Comerica, guide our treatment of customers, colleagues, business partners and the communities we serve, and help ensure compliance with applicable laws and regulations. Our principal Code of Ethics, the Code of Business Conduct and Ethics for Employees, applies to all colleagues, and we have additional codes for senior financial officers and members of our Board of Directors to reflect their heightened responsibilities.

Code Name	Description	Applies To
Code of Business Conduct and Ethics for Employees	Provides guidance on issues such as ethical business practices, fair dealing, maintaining professional relationships, avoiding conflicts of interest, respecting confidentiality, protecting privacy in the workplace, managing risk, complying with applicable laws and reporting illegal or unethical behavior and retaliatory actions	All colleagues
Senior Financial Officer Code of Ethics	Outlines additional requirements and highlights the importance of honesty, integrity and sound judgment for our senior financial officers	Chairman, President and CEO/ Senior Financial Officers
Code of Business Conduct and Ethics for Members of the Board of Directors	Provides guidance on recognizing and handling ethical issues, sets expectations regarding a variety of situations and provides information on how to manage unethical conduct and to assist in fostering a culture of openness and accountability	Board of Directors

Oversight and Governance

We have a robust governance program, overseen by our Board of Directors and senior leadership, to help support a culture of compliance at all levels of the organization and to operationalize compliance throughout the business.

Compliance Responsibilities

Enterprise Risk Committee of the Board of Directors	Maintains accountability for Comerica's compliance with applicable legal and regulatory requirements Reviews and approves Comerica's Compliance Management System (CMS) Program and Compliance Risk Management Policy
Chairman and CEO	Holds colleagues accountable for appropriately assessing and effectively managing compliance risks associated with their activities
Enterprise-Wide Compliance Committee	Composed of senior and executive leaders, including management responsible for overseeing compliance, audit and risk Oversees and reviews CMS Program and Compliance Risk Management Policy
Chief Risk Officer and Chief Compliance Officer	Set the overall vision and approach for management of compliance risk management within Comerica Develop, implement and maintain an effective CMS Program
Compliance Risk Management	Maintains Comerica's CMS Program and Compliance Risk Management Policy Maintains and deploys appropriate systems, tools and awareness in support of the CMS Program Directs training efforts in support of the CMS Program Provides guidance and effective challenge to First Line of Defense
Business Risk and Control Officers	Coordinate with the Business Units, Corporate Compliance and other stakeholders to manage risk
Business Units	Own the compliance risks created by First Line of Defense activities and maintain controls to manage those risks Hold colleagues accountable for appropriately assessing and effectively managing compliance risks associated with their activities

Compliance Management System (CMS)

Comerica's CMS Program is designed to effectively identify, measure, monitor and control compliance risk and maintain compliance with applicable laws, rules and regulations as well as applicable governance documents.

Supplier Conduct

We also require that suppliers and third parties conduct themselves with the same high standards of honesty, fairness and integrity. Suppliers must abide by applicable federal, state and local laws, rules and regulations while ensuring that services are conducted with a high degree of professionalism and in accordance with the terms and conditions of the relationship. Additional information on supplier requirements can be found on [Comerica.com](https://www.comerica.com).

Communication and Training

We use a variety of communication channels, including mandatory annual online training and our intranet site, to emphasize personal accountability in complying with our Code of Business Conduct and Ethics for Employees provisions and to remind colleagues of the importance of reporting inappropriate and/or illegal conduct. Our contingent workers also complete training, which includes information on the Code of Business Conduct and Ethics for Employees.

Comerica colleagues complete additional annual mandatory training courses on topics that include regulatory requirements, privacy and information protection, anti-money laundering, inclusion, workplace harassment, workplace safety and fair lending as well as a one-time sustainability training course for new hires.

The Corporate Learning department tracks training completion and provides access to reporting to Compliance Risk Management to escalate with senior management, as appropriate, if training is not completed. For additional compliance training metrics, review our [Responsible Business Key Metrics Table](#).

Reporting and No Retaliation Policy

At Comerica, we foster a culture where colleagues are encouraged to speak up and raise questions and concerns without fear of retaliation, as outlined in our non-retaliation statement included in our Code of Business Conduct and Ethics for Employees. We provide several channels for reporting violations of laws, rules and regulations that apply to our business, in addition to violations of our Code of Business Conduct and Ethics for Employees and other Comerica policies. Comerica maintains three hotlines for colleagues that provide a confidential reporting process through a third-party vendor. Calls to these hotlines can be made anonymously. In 2024, 55 concerns were recorded via the hotline and these concerns have been closed.

Anti-Money Laundering (AML) Compliance

We strictly comply with all Bank Secrecy Act (BSA) and USA PATRIOT Act requirements. In accordance with these requirements, the following people, policies and procedures are part of our AML Compliance Program:

- A designated BSA/AML Compliance Officer
- Policies, procedures and controls designed to guard against money laundering
- Ongoing compliance training
- Independent auditing of the program

Our 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 policies are periodically reviewed, updated and approved by our Board of Directors.

Our Customer Identification Program is a core element of our AML Compliance Program and fulfills our obligations by collecting and verifying identifiable information to ensure that we know who holds Comerica accounts. This information is compared to government lists of sanctioned parties and others with whom we are prohibited from doing business and helps prevent financial transactions when necessary.

For additional information, visit the [AML Compliance](#) section on our website.

AML Training

Colleagues, when applicable, are required to complete additional annual regulatory and AML Compliance training.

Human Rights

Through our Corporate Responsibility Council, we adopted a [Human Rights Statement](#) that outlines our commitments to protect and advance human rights throughout our business and across our supply chain. This statement complements our codes of ethics and policies on equal opportunity, workplace harassment and discrimination and fair lending. Highlights include:

- We support and respect the protection and preservation of human rights as directed by the principles in the United Nations Guiding Principles.
- We strive to create an environment of respect for all individuals. We do not tolerate corruption, discrimination, harassment, child labor, prison labor, forced labor or slavery in any form.
- We live our Core Values by supporting the protection of the rights of individuals for all in the workplace and in society.

As Comerica primarily does business in the United States, we have no direct presence or investment in countries where lack of human rights protection is a known significant problem.

Fair and Responsible Banking

In 2024, Comerica's Fair and Responsible Banking Team continued to execute on its Fair Lending and Responsible Banking Program. The team's responsibilities include:

- Ensuring that all customers, prospective customers and communities are treated fairly and equitably regardless of race, sex or sexual orientation, color, national origin, religion, age, marital status, disability, familial status and other protected classes
- Ensuring that Comerica is meeting the credit needs of the communities where we do business, including low- and moderate-income (LMI) neighborhoods, and is not allowing discriminatory credit practices
- Understanding and identifying fair lending and responsible banking risks across the enterprise to help business leaders effectively mitigate and monitor those risks within their departments

The Executive Vice President of Corporate Affairs oversaw this office until the fourth quarter of 2024, when the Office of Fair and Responsible Banking team moved to Compliance Risk Management. The Fair and Responsible Banking Committee met quarterly throughout the year and included the Director of Fair and Responsible Banking, Chief Compliance Officer, and other compliance, risk, audit and legal representatives.

Community Reinvestment Act (CRA)

Comerica received the highest overall rating of "Outstanding" in its 2023 CRA examination by the Federal Reserve Board (FRB). This examination consisted of a review of the bank's 2020, 2021 and 2022 CRA small business lending data and mortgage data, as well as community development loans, investments and services between January 1, 2021, and June 30, 2023. The next CRA examination review will be conducted in 2025. Refer to the [Community Reinvestment page on Comerica.com](#) for details on additional factors that supported our CRA rating.

Comerica's CRA Governance and Reporting team oversees Comerica's CRA compliance across all lines of business, ensuring that Comerica is meeting the credit needs of the communities where we do business, including LMI neighborhoods, and maintains an ongoing monitoring program to provide lines of business with timely information about Comerica's CRA lending, investments and services. To support Comerica CRA activities, we have a dedicated team of External Affairs market and community impact managers who work with community partners to identify and support the needs of the markets where we operate.

CRA-related guidance and recommendations are made based on feedback received from our Community Development Advisory Councils (CDACs), other trusted community partners, data analysis, peer analysis, research related to current market conditions and the results of our CRA examinations.

To share CRA best practices, Comerica participates in peer bank and industry meetings across our markets.

Support for Our Communities in 2024



Over 94%

of senior officers completed three hours or more of CRA volunteer service



~800

Comerica Financial Education Brigade members trained youth and adults in LMI communities



8,700+

CRA-qualified service hours by CRA-trained Comerica volunteers to more than 170 organizations across all markets

Fair Lending

The Fair Lending and Responsible Banking team provides guidance and oversight of Comerica's Fair Lending and Responsible Banking Program. The team performs monitoring and testing to ensure First Line of Defense colleagues are accountable for appropriately assessing and effectively managing fair lending and redlining risks associated with their activities.

Data and Regulatory Reporting

The CRA Governance and Reporting department manages the annual regulatory data submission for the Community Reinvestment Act (CRA) and Home Mortgage Disclosure Act (HMDA) regulations and supports related regulatory examinations. Additionally, the department consults with lines of business on data collection and reporting requirements, performs data integrity reviews, provides guidance on CRA qualified activities and develops analytical reports that the team then uses to assist with strategic decision-making.

Public Policy and Government Relations

Legislation passed at the state and federal levels can have a big impact on Comerica's products and services. Our Government Relations Group works closely with our lines of business to monitor and provide input on the development of public policies that directly affect our company and industry.

Our advocacy efforts are focused on the federal level and in our key market states. Comerica primarily engages with national and state financial services trade associations to inform them of our policy views so that they can advocate on behalf of the regional banking industry.

Another way Comerica participates in the political process is through contributions from its Political Action Committee (PAC). The PAC annually solicits contributions from eligible colleagues and makes bipartisan contributions — all 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. Comerica does not use corporate funds to make direct political contributions to candidates for public office or groups organized to influence political campaigns, in accordance with Section 527 of the Internal Revenue Code.

\$352,000

Comerica PAC contributions to political candidates and committees (November 1, 2023 to October 31, 2024)

Comerica is also an active member of several financial services trade associations across the country. Membership benefits include business opportunities for the company and effective grassroots advocacy on behalf of the industry. We monitor these organizations closely for any changes in policy positions to ensure transparency and alignment with Comerica Core Values. A portion of Comerica's trade associations' dues is used for lobbying and/or political activities and is non-deductible under Section 162(e)(1) of the Internal Revenue Code.

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Key Metrics Tables

Our Company	2022	2023	2024
Gross revenue (millions \$) ¹¹	3,534	3,592	3,244
Market capitalization at year-end (millions \$) ¹²	8,755	7,361	8,128
Common and preferred stock dividends (millions \$)	379	398	399
Taxes (millions \$)	366	368	214
Employee compensation and benefits (millions \$)	1,208	1,306	1,352
Goods and services purchased (millions \$)	906	1,101	1,017
Total loans at year-end (millions \$)	53,402	52,113	50,539
Customers	2022	2023	2024
Small Business Support			
SBA lending, including 7(a) and 504 loans (millions \$) ¹³	186	151	186
Corresponding number of small businesses supported	3,798	5,994	5,902
Innovation and Technology			
Real-time payments average monthly volume (% change)	33	31	24
ACH average monthly volume (% change)	(7)	1	(3)
Wire transfers average monthly volume (% change)	(20)	(16)	(4)
Number of mobile banking Users (% change)	3	5	3
Click & capture mobile deposits (% change)	(1)	(2)	2
Zelle transactions (% change)	25	21	10
Web bill payment sent electronically (% change)	5	(17)	5
Checking statements sent electronically/month (% change)	4	3	3

¹¹ Gross revenues equal net interest income and noninterest income, which comes directly from the [2024 Comerica Annual Report \(F-41\)](#).

¹² Calculated using Issued Shares Less Treasury Shares per [Comerica's 2024 Annual Report](#), Consolidated Balances Sheets, multiplied by 12/31/24 closing stock price.

¹³ Includes 7(a), 504 and Express loans.

Customers	2022	2023	2024
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ESG-Related Lending and Investment

See [Environmentally Beneficial Lending Metrics](#)

See [Community Investment and Development Metrics](#)

Colleagues	2022	2023	2024
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Talent Attraction - Colleague Demographics

Total colleagues	Full-time equivalents (FTEs) ¹⁴		7,488	7,701	7,766
	Total number of colleagues ¹⁵		7,649	7,863	7,928
Colleague breakdown by length of service	% 0-5 years		47	48	50
	% 6-15 years		22	22	23
	% 16-25 years		17	17	15
	% 26+ years		14	13	12
New hires by market	California	Number of new hires	259	224	175
		% of Total	16	16	14
	Florida	Number of new hires	30	14	27
		% of Total	2	1	2
	Michigan/Carolinas	Number of new hires	860	712	528
		% of Total	54	50	42
	Texas/Arizona/Colorado	Number of new hires	442	445	466
		% of Total	28	31	37
	Other	Number of new hires	—	40	69
		% of Total	—	3	5

¹⁴ As reported in [Comerica's 2024 Annual Report \(PDF Page 2\)](#). The FTE number reported here is used for the intensity-based metrics in the [Environment Key Metrics](#) table.

¹⁵ As reported in [Comerica's 2024 Annual Report \(PDF Page 26\)](#) by combining full-time and part-time totals.

Colleagues	2022	2023	2024
Talent Development			
Average hours of completed training per colleague (mandatory and non-mandatory)	25	24	22
Total training hours completed by colleagues	230,000	184,202	197,746
Percentage of colleagues who took advantage of non-mandatory, non-compliance skills training	83	66	53
Number of skills-based courses offered to Comerica colleagues	29,192	14,000	23,099
Leadership Development Program (number of graduates)	21	25	28
Emerging Leaders Program (number of graduates)	45	39	—
Senior Leadership Development Program (number of participants)	72	62	40
Talent Retention			
Services provided through Comerica's Employee Assistance Program (number of instances)	4,828	5,026	4,306
Colleagues receiving tuition assistance (total number)	95	103	103
Value of tuition assistance received (\$)	387,845	406,549	400,829
Colleague recognition awards (number of monetary recognition awards to colleagues)	2,963	2,770	2,370
Value of colleague recognition awards (\$)	623,768	493,318	592,811
Average tenure (years)	12	12	11

Colleagues			2022	2023	2024	
Talent Retention						
Colleague turnover total	Number of colleagues		1,534	1,139	1,365	
	Percent of total colleagues		17	13	17	
Colleague turnover by type and market	Voluntary	Number of	1,280	847	962	
		% of Total	83	74	70	
	California %		18	16	13	
	Florida %		1	2	2	
	Michigan/Carolinas %		54	55	57	
	Texas/Arizona/Colorado %		27	28	28	
	Involuntary	Number of		254	292	403
		% of Total		17	26	30
		California %		14	19	9
		Florida %		1	2	—
Michigan/Carolinas %		54	66	64		
Texas/Arizona/Colorado %		31	13	27		

Colleagues	2022	2023	2024
Employee Engagement			
Number of Impact Team categories	11	12	14
Number of Impact Team chapters in our markets	20	20	22
Total in closed business from Impact Team business referrals (millions \$)	525	599	649
Number of Green Office Teams ¹⁶	9	3	3
Colleagues participating in market-based green teams ¹⁶	N/A	310	348
Number of colleagues Participating in Financial Education Brigade	868	834	797
Colleagues enrolled in Comerica's Sustainability Awareness Program - MSA (number of) ¹⁷	671	933	935
Seedling-level certified colleagues (number of)	97	110	117
Sapling-level certified colleagues (number of)	21	32	39
Mighty Oak-level certified colleagues (number of)	6	9	7

¹⁶ Comerica transitioned from office-based green teams to market-based green teams in 2023. We have three active market green teams covering Michigan, Texas and California.

¹⁷ Sustainability Awareness Program (MSA) level listings are cumulative. If a colleague has been certified at the highest level, colleague is also counted in the lower certification levels.

Community	2022	2023	2024
Financial Inclusion and Financial Education			
Number of ATMs	630	627	505
Number of U.S. banking centers (total)	409	407	380
Comerica Secured Credit Cards (number of) for low- and moderate-income (LMI) customers ¹⁸	445	476	483
Number of Access Checking customers (LMI customers) ¹⁹	7,591	7,749	10,032
Access Checking Balances (LMI customers) (millions \$)	37	24	27
Number of LMI individuals reached through Comerica-sponsored financial education events with nonprofit partners	79,932	105,564	102,228
Number of small business bootcamps held	N/A	481	4,343
Number of small business bootcamp attendees	N/A	8,114	95,327
Total number of technical assistance and educational programs hosted at BusinessHQ	N/A	91	149
Number of CRA qualified small business education programs	N/A	481	4,343
Total value of no-cost rent provided to in-house technical assistance nonprofit partners (\$)	N/A	10,496	23,616
Amount of commitments made to SBA-licensed investments (millions \$)	N/A	8	—
Hours of coworking utilized by small business owners and nonprofit organizations	N/A	2,481	6,453
Number of people served through BusinessHQ centers	N/A	1,599	2,788
Total value of no-cost coworking provided at BusinessHQ (\$)	N/A	42,408	108,864
Number of state/local government benefit card programs	35	41	48
Number of Community Development Financial Institutions (CDFI)	11	2	2
CDFI investments (millions \$)	8	7	1

¹⁸ Tailored retail banking products within our CRA Assessment areas in Arizona, California, Michigan and Texas.

¹⁹ Access Checking account has no monthly fee with \$250 direct deposit.

Community	2022	2023	2024
Community Investment and Development			
Total community and economic development loans (millions \$)	2,023	2,080	2,356
Low-income housing tax credit (LIHTC) investment deals (millions \$)	95	94	119
New market tax credit (NMTC) investment deals (millions \$)	14	3	24
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (percent)	4	4	6
Volunteerism and Philanthropy			
Charitable gifts and corporate contributions (millions \$)	8.4	9.8	9.2
Colleague United Way commitments pledged during campaigns (millions \$)	1.7	1.9	1.8
Colleague time volunteered (hours)	66,270	79,658	84,365
Corporate-wide colleague volunteer goal (hours)	61,000	62,000	65,000
Number of colleague volunteers	3,356	3,783	4,174
Approximate worth of colleague volunteer time (millions \$) ²⁰	2.0	2.5	2.8

²⁰ Based on data from Independent Sector, the dollar value of time provided by a volunteer in 2024 was \$33.49.

Environment	2012	2022	2023	2024
Energy				
Energy use (MWh)				
Total direct and indirect energy use - real estate and transport (MWh)	153,210	98,450	94,176	85,736
Total direct and indirect energy use - real estate and transport (billion joules)	551,556	354,419	339,034	308,641
Total direct and indirect energy use - real estate only (MWh) ²¹	148,266	95,044	90,532	82,517
Direct energy use - fossil fuels (MWh)	30,966	27,393	27,650	24,254
Indirect energy use - purchased electricity, steam, chilled water in metered buildings (MWh)	93,779	50,702	47,411	22,119
Indirect energy use - estimated electricity use in leased (and unmetered) buildings (MWh)	28,465	13,022	14,110	11,352
Energy intensity				
Total direct and indirect energy use - real estate (MWh) per square foot at year-end	0.0267	0.0228	0.0201	0.0220
Total direct and indirect energy use (MWh) per FTE	16.96	13.15	12.23	11.04
Climate Change and Greenhouse Gas (GHG) Emissions²²				
Total GHG emissions from Scope 1 and 2 Real Estate and Scope 1 Travel (metric tons of CO ₂ e)	81,734	35,046	34,903	32,140
GHG emissions - Scope 1 and 2 Real Estate only (metric tons of CO ₂ e)	80,533	34,207	34,005	31,345
Emissions intensity - real estate (metric tons of CO ₂ e per square foot at year-end) within organization	0.0145	0.0082	0.0075	0.0083
Percent cumulative Scope 1 and 2 (location-based) GHG reduction from 2012 base year (goal = 65 percent GHG reduction from base year by 2030)	N/A	57	57	61
GHG emissions - Scope 1 Transport only	1,201	839	898	795

²¹ Total direct and indirect Energy Use – Real Estate only includes Natural Gas, Diesel Fuel, Gasoline Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and/or Chilled Water.

²² Comerica uses the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its 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 most recent CDP Response](#).

Environment	2012	2022	2023	2024
Climate Change and Greenhouse Gas (GHG) Emissions				
Breakdown by Scope				
Scope 1 GHG emissions - natural gas, jet fuel, diesel, gasoline and refrigerants	6,950	6,242	5,682	5,391
Scope 2 GHG emissions (location-based)	74,784	28,804	29,221	26,749
Scope 2 GHG emissions (market-based)	74,784	29,699	25,570	22,710
Scope 3 GHG emissions (metric tons of CO ₂ e) - Supply Chain and Transport				
Category 1 - Purchased Goods and Services				
Gross (metric tons of CO ₂ e)	N/A	64,213	80,117	64,228
Category 2 - Capital Goods				
Gross (metric tons of CO ₂ e)	N/A	3,846	4,497	3,483
Category 3 - Fuel and Energy-Related Activities				
Electricity transmission/distribution loss emissions	N/A	1,566	1,387	1,147
Category 4 - Upstream Transportation and Distribution				
Gross (metric tons of CO ₂ e)	N/A	3,649	1,158	769
Category 5 - Waste Generated in Operations				
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	402	391	381
Category 6 - Business Travel				
Employee business travel by air and car	4,431	2,389	3,213	2,587
Emissions intensity - employee business travel emissions (metric tons of CO ₂ e) per FTE	0.49	0.32	0.42	0.33
Category 7 - Employee Commuting				
Employee commuting emissions (metric tons of CO ₂ e)	N/A	16,953	18,846	19,175

Environment	2012	2022	2023	2024
Category 13 - Downstream Leased Assets				
Total downstream leased assets	1,257	502	283	251
Subleased metered electricity	726	186	93	71
Subleased estimated electricity	423	—	—	—
Subleased natural gas	81	70	18	11
Subleased steam	28	—	—	—
Subleased estimated heat - natural gas	N/A	—	—	—
Subleased corporate jet emissions	N/A	246	172	169
Climate Change and Greenhouse Gas (GHG) Emissions				
Category 15 - Investments				
Financed emissions ²³	N/A	9,571,941	9,058,233	9,741,822
Other Downstream				
CBRE business travel on Comerica account	N/A	132	157	165
Comerica leased fleet	N/A	79	75	73
Real estate square footage (square feet at year-end)				
Total metered and unmetered (square feet at year-end)	5,545,466	4,171,534	4,505,483	3,756,951
Total subleased (square feet at year-end)	137,637	30,412	27,993	23,335
Environmental Resource Management				
Waste				
Landfilled colleague waste (short tons)	2,086	1,300	1,265	1,231
Percent cumulative reduction from 2012 base year (Goal = 20 percent landfilled waste reduction by 2020)	N/A	38	39	41
Total recycled/repurposed waste (short tons)	3,370	1,527	2,656	2,577
Recycled office paper	3,108	1,285	1,228	1,147

²³ Includes Business Loans Asset Class as defined by PCAF.

Environment	2012	2022	2023	2024
Recycled/repurposed electronic equipment	149	78	24	70
Recycled operational waste	110	150	1,381	1,350
Recycled cardboard baler waste	N/A	3	19	2
Recycled pallets	N/A	9	2	1
Universal waste	3	2	2	7
Total waste diverted from landfill - including recycled office paper, recycled/repurposed electronic equipment, recycled colleague waste and universal waste (percent)	62	54	53	53
Paper				
Total paper consumption (tons)	1,266	360	297	120
Office copy paper consumption (tons)	560	116	88	62
Other office paper consumption (tons)	618	239	197	47
Marketing paper consumption (tons)	88	5	12	11
Paper intensity metrics (pounds consumed per FTE)				
Total office paper (office copy and other office paper) consumption in pounds per FTE	260.76	94.68	73.84	27.84
Office copy paper consumption in pounds per FTE	123.96	30.89	22.78	15.86
Percent cumulative reduction from 2012 base year (goal = 50 percent office copy paper reduction by 2020)	N/A	79	84	89
Environmental Attributes of Paper				
Total FSC-certified office paper (percent of total) ²⁴	47	31	3	61
Total FSC-certified marketing paper (percent of total)	64	100	—	—
Office copy paper >= 30 percent post-consumer recycled content (percent of total office copy paper)	97	92	8	61
All other papers (excluding office copy paper) >= 10 percent post-consumer recycled content (percent of total papers except office copy paper)	14	4	6	27
Total post-consumer recycled content by weight (percent of total paper consumption)	14	9	1	12

²⁴ Due to supply chain issues in 2023, the availability of Forest Stewardship Council® FSC-certified and recycled paper was significantly impacted.

Environment	2012	2022	2023	2024
Water Stewardship				
Total water consumption (cubic meters) ²⁵	451,532	322,840	283,594	233,812
Intensity metric - water consumption (cubic meters per total colleague FTE)	49.98	43.11	36.83	30.11
Percent cumulative reduction from 2012 base year (goal = 30 percent water reduction by 2020)	N/A	28.5	37.2	48.2
Environmentally Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)				
Loans and commitments (billions \$)	1.04	2.68	2.87	3.18
Loans and commitments (number of companies)	127	148	164	164
Supplier Sustainability Engagement				
Percent of carpet purchases that were NSF 140 Gold rated and/or Cradle-to-Cradle Silver certified	99	100	100	66
Percentage of flooring purchases, including carpet and vinyl flooring, that contained recycled content	N/A	70	99	85
Percentage of computers and displays purchased that carried an EPEAT rating	N/A	100	100	100
Percentage of furniture purchases that were BIFMA® level certified	N/A	98	94	91
Percentage of office supplies purchased from Office Depot that contained post-consumer recycled content	N/A	21	10	8
Percentage of office supplies purchased from Office Depot that were at least “light green” in Office Depot’s GreenerOffice™ Eco-Rating System	57	30	5	13

²⁵ 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.

Responsible Business	2022	2023	2024
Compliance Training			
Number of internal incidents of alleged corrupt behavior investigated	225	211	243
Number of cases in which allegations were substantiated and/or colleague admitted involvement	70	70	89
Number of legal rulings against Comerica or its colleagues for corruption	0	0	0
Colleague Annual Compliance Training (percent relevant colleagues who completed the required course)			
Anti-Money Laundering	99.9	99.8	99.9
Comerica Code of Business Conduct and Ethics for Employees	99.9	99.9	100.0
Fair Lending Anti-Discrimination	99.8	99.7	99.9
Information Privacy and Protection	99.9	99.9	99.9
Community Reinvestment Act	99.9	99.9	99.9
Financial Exploitation of the Elderly or Dependent Adults	99.9	99.8	100.0
Workplace Harassment	99.9	99.8	99.9
Information Lifecycle Management	99.9	99.8	100.0
Sustainability	100.0	99.6	100.0
Public Policy and Government Relations			
Comerica PAC contributions to political candidates and committees (thousands \$) ²⁶	344	65	352

²⁶ Comerica PAC contributions (Nov. 1 previous year–Oct. 31 reporting year)

Reporting Methodology

Comerica's 2024 Corporate Responsibility Report represents our latest report on the most significant corporate responsibility-related matters for our business and stakeholders. We recognize the interconnected nature of environmental, social and governance topics as they relate 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 and social impacts.

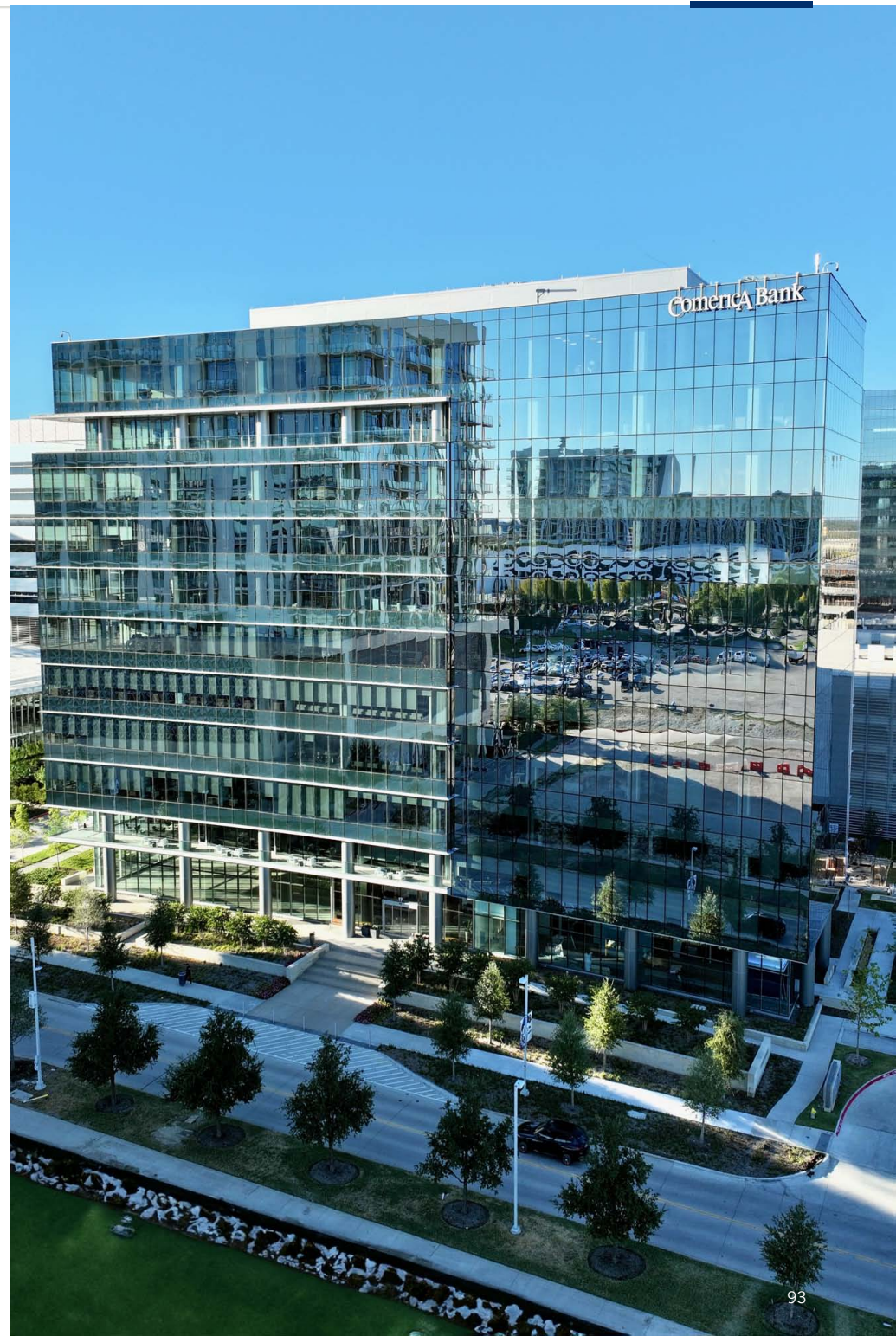
We use the internationally recognized GRI Sustainability Reporting Standards to guide our reporting and track our progress. This report has been prepared in reference to the GRI Standards. This report is Comerica's 12th GRI-related Corporate Responsibility or Sustainability Report. It covers our corporate responsibility-related performance from January 1, 2024 to December 31, 2024 (fiscal year 2024). In some instances, data from previous years is included for comparison, and in some limited instances, the report also references some projects and initiatives that stretched beyond 2024 and into 2025.

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2024 Comerica Incorporated Annual Report](#) (herein referred to as 2024 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2024. 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. We have also mapped our Impact Topic groupings to the United Nations 17 Sustainable Development Goals (SDGs) as illustrated in the [Corporate Responsibility Platform Alignment](#) portion of this report.

In addition to GRI, Comerica also acknowledges other sustainability reporting guidelines, including those outlined by the Sustainability Accounting Standards Board (SASB) Financials sector standards, now governed by the International Sustainability Standards Board (ISSB). 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 GRI Standards Content Index and SASB Standards Content Index are provided within this report.

To learn more about sustainability and corporate responsibility at Comerica, visit us at [Comerica.com/sustainability](https://www.comerica.com/sustainability). To provide feedback on our reporting, contact Scott Beckerman, Director of Corporate Sustainability, at jsbeckerman@comerica.com.



GRI Standards Content Index

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” in a GRI-context, 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 generally been omitted from this table. The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our 2024 Comerica Incorporated Annual Report (herein referred to as [2024 Annual Report](#)). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2024. References to the “Board” refer to the Board of Directors of Comerica Incorporated.

Statement of use	Comerica Incorporated has reported the information cited in this GRI content index for the period January 1, 2024 to December 31, 2024 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard Disclosure and Requirements	Location
GRI 2: General Disclosures 2021	
2-1 Organizational details	Comerica Incorporated (NYSE: CMA) 2024 Annual Report North American Presence: Our Company
2-2 Entities included in the organization’s sustainability reporting	Reporting Methodology
2-3 Reporting period, frequency and contact point	Corporate Responsibility Reporting period: January 1, 2024 to December 31, 2024 Reporting cycle: Annual Reporting Methodology
2-4 Restatements of information	Reducing GHG Emissions - restatement of financed emissions for 2019-2022
2-5 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). GHG Emissions Verification Declaration
2-6 Activities, value chain and other business relationships	Our Company 2024 Annual Report : Item 1. Business — General, page 3; Item 2. Properties, page 29; Financial Review and Reports — Notes to Consolidated Financial Statements — Note 22 - Strategic Lines of Business, pages F-92-F-95 Supplier Engagement ; Supporting Supply Chain Sustainability Customers ; Community

GRI Standard Disclosure and Requirements	Location
2-7 Employees	Key Metrics - Colleagues 2024 Annual Report , page 2 and 15-16 Employee data provided for year-end 2024
2-8 Workers who are not employees	The majority of work is performed by Comerica payrolled employees. Non-employee contingent workers represent 18.4% of our total workforce. At Comerica, we track all contingent workers who access our systems by adding them to our human resource information system. Contingent worker data provided for year-end 2024
2-9 Governance structure and composition	Oversight of Corporate Responsibility at Comerica 2025 Proxy Statement : Executive Summary — Director Qualifications and Experience, page 10; Proposal 1: Election of Directors — Committees and Meetings of Directors, pages 20-23; Board Leadership Structure, page 18; Director Independence, pages 24-27; Information About Nominees, pages 11-17 Corporate Governance Guidelines — 1. The Board, Its Committees and Management, Board Committee, pages 1-2 CDP Climate Change Response
2-10 Nomination and selection of the highest governance body	2025 Proxy Statement : Proposal 1: Election of Directors — Corporate Governance Practices — Nominee Selection Process, pages 18-19 Corporate Governance Guidelines — 2. Director Nominations, pages 2-3
2-11 Chair of the highest governance body	2025 Proxy Statement : Proposal 1: Election of Directors — Board Leadership Structure, page 18
2-12 Role of the highest governance body in overseeing the management of impacts	Oversight of Corporate Responsibility at Comerica; Governance and Performance 2025 Proxy Statement : Executive Summary — Governance Overview and Corporate Citizenship, page 6; Board Leadership Structure (facilitating director duties), page 18; Proposal 1: Election of Directors — Board Oversight, page 22; Proposal 1: Election of Directors — Role in Risk Oversight, page 23
2-13 Delegation of responsibility for managing impacts	Our Corporate Responsibility Approach; Oversight of Corporate Responsibility at Comerica; Governance and Performance 2025 Proxy Statement : Executive Summary — Governance Overview and Corporate Citizenship, page 6; Proposal 1: Election of Directors — Corporate Governance Practices — Board Oversight, page 22 CDP Climate Change Response
2-14 Role of the highest governance body in sustainability reporting	Our Executive Vice President of Corporate Affairs, member of the Management Executive Committee, reviews and approves Comerica's Corporate Responsibility Report.

GRI Standard Disclosure and Requirements	Location
2-15 Conflicts of interest	<p>Corporate Governance Guidelines — 4. Director Qualifications and Independence, pages 4-7</p> <p>Code of Business Conduct and Ethics for Members of the Board of Directors — Conflicts of Interest, pages 1-3</p> <p>2025 Proxy Statement: Proposal 1: Election of Directors — Transactions with Related Persons, pages 27-28; Director Independence — Director Transactions, Relationships or Arrangements by Category or Type, page 26</p> <p>2024 Annual Report: Financial Review and Reports — Notes to Consolidated Financial Statements — Note 19 - Transactions with Related Parties, page F-90</p>
2-16 Communication of critical concerns	<p>2025 Proxy Statement: Other Information — Communication with the Non-Management Directors and Board, page 97</p> <p>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>Corporate Governance Guidelines — 19. Director Orientation and Continuing Education, page 12</p>
2-18 Evaluation of the performance of the highest governance body	<p>2025 Proxy Statement: Proposal 1: Election of Directors — Board Leadership Structure — Annual Self-Evaluation, page 18</p> <p>Corporate Governance Guidelines — 21. Annual Performance Evaluation, page 13</p>
2-19 Remuneration policies	<p>2025 Proxy Statement: Proposal 1: Election of Directors — Compensation of Directors, pages 29-31 and 31-33; Proposal 3: Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis, pages 39-85 — Severance Benefits and Change of Control Agreements, page 60 — Other Compensation Practices and Policies — Clawback Policies, pages 61-62 — Potential Payments Upon Termination or Change of Control at Fiscal Year-End 2024, pages 74-76</p> <p>Corporate Governance Guidelines — 10. Stock Ownership, pages 9-10</p>
2-20 Process to determine remuneration	<p>2025 Proxy Statement: Proposal 1: Election of Directors — Compensation of Directors, pages 29-31; Proposal 3: Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Shareholder Outreach & Compensation Philosophy — Roles and Responsibilities, page 43 and 45</p> <p>Corporate Governance Guidelines — 18. Director Compensation, page 12</p>
2-21 Annual total compensation ratio	<p>2025 Proxy Statement: Pay Ratio Disclosure, page 85</p>
2-22 Statement on sustainable development strategy	<p>Message from Our Chairman, President and CEO</p>

GRI Standard Disclosure and Requirements	Location
2-23 Policy commitments	Climate Change ; Enterprise Security ; Compliance and Ethics (Code of Ethics and Supplier Conduct) ; Human Rights Inclusion Commitment Human Rights Statement 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
2-26 Mechanisms for seeking advice and raising concerns	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
2-27 Compliance with laws and regulations	For disclosure, if applicable, to material pending legal proceedings concerning non-compliance with laws and regulations, see the 2024 Annual Report : Financial Review and Reports — Notes to Consolidated Financial Statements — Note 21 — Contingent Liabilities, pages F-91-F-92.
2-28 Membership associations	Trade Associations CDP Climate Change Response
2-29 Approach to stakeholder engagement	Impact and Stakeholder Engagement
2-30 Collective bargaining agreements	Comerica does not have employees under collective bargaining agreements.
GRI 3: Material Topics 2021	
3-1 Process to determine material topics	Our Impact Assessment Process
3-2 List of material topics	Our Impact Assessment Process

GRI Standard Disclosure and Requirements	Location
3-3 Management of material topics	<p>Customers; Colleagues; Inclusion; Community; Environment; Responsible Business; Business Risk Management; Enterprise Security; Privacy and Data Protection; Compliance and Ethics; Public Policy and Government Relations; Small Business Support; Governance and Priorities; Supplier Engagement; Volunteerism and Philanthropy (Volunteering Goals); Reducing GHG Emissions; Reducing Paper, Waste and Water Impacts; Enterprise Security; Key Metrics Tables</p> <p>Code of Business Conduct and Ethics for Employees</p> <p>Senior Financial Officer Code of Ethics</p> <p>Code of Business Conduct and Ethics for Members of the Board of Directors</p> <p>Environmental Policy Statement</p> <p>Anti-Discrimination Policy and Funding Limitations</p> <p>CDP Climate Change Response</p>
GRI 201: Economic Performance 2016	This is not a Comerica Impact Topic; however, we do share information below that is of interest to some stakeholders.
201-1 Direct economic value generated and distributed	<p>Key Metrics - Our Company; Key Metrics - Community; Key Metrics - Customers</p> <p>2025 Proxy Statement: Executive Summary — 2024 Financial Performance and 2024 Peer Comparisons, page 5</p> <p>2024 Annual Report: Financial Review and Reports — Notes to Consolidated Financial Statements — Note 24 - Revenue from Contracts with Customers, page F-98</p>
201-2 Financial implications and other risks and opportunities due to climate change	<p>CDP Climate Change Response</p> <p>2024 Annual Report: Item 1A. Risk Factors — General Risk, page 25</p> <p>Reducing Environmental Risk Through Credit and Lending Practices</p>
201-3 Defined benefit plan obligations and other retirement plans	<p>2025 Proxy Statement: Proposal 3: Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2024 Pay Actions — Other Benefits Programs and Compensation, pages 57-58</p> <p>2024 Annual Report: Financial Review and Reports — Critical Accounting Estimates — Pension Plan Accounting, page F-38; 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-83-F-87; Cash Flows, page F-87</p>
GRI 202: Market Presence 2016	This is not a Comerica Impact Topic.
GRI 203: Indirect Economic Impacts 2016	Our Comerica Impact Topics, Responsible Investing & Financing, Financial Education, Access & Inclusion, Community, and Diversity, Equity & Inclusion generally align with the GRI 203 Indirect Economic Impact disclosure. See Community section.
203-1 Infrastructure investments and services supported	Community ; Strengthening Our Communities ; Volunteerism and Philanthropy

GRI Standard Disclosure and Requirements	Location
203-2 Significant indirect economic impacts	Small Business Support ; Financial Inclusion ; Empowering and Strengthening Our Communities ; Supplier Engagement ; Talent Outreach ; Community ; Volunteerism and Philanthropy 2025 Proxy Statement : Executive Summary — Community in 2024, page 7
GRI 204: Procurement Practices 2016	This is not a Comerica Impact Topic itself but elements are related to Impact Topic of Responsible Sourcing. See Supplier Engagement and Supporting Supply Chain Sustainability sections.
204-1 Proportion of spending on local suppliers	61% of our supply base (by number of suppliers) and 48% of the total spend is located in three of our key markets: Texas, California and Michigan. We use approximately 1,249 suppliers in Michigan, 941 in California and 1,064 suppliers in Texas.
GRI 205: Anti-Corruption 2016	Our Comerica Impact Topics, Ethics & Reputation and Regulatory Compliance & Public Policy, generally align with GRI 2015 Anti-Corruption. See Compliance and Ethics section.
205-1 Operations assessed for risks related to corruption	2024 Annual Report : Item 1A - Risk Factors (pages 16-28)
205-2 Communication and training about anti-corruption policies and procedures	Responsible Business ; Key Metrics - Responsible Business
205-3 Confirmed incidents of corruption and actions taken	Key Metrics - Responsible Business
GRI 206: Anti-Competitive Behavior 2016	Our Comerica Impact Topics, Ethics & Reputation and Regulatory Compliance & Public Policy, generally align with GRI 2015 Anti-corruption. See Compliance and Ethics section.
GRI 207: Tax 2019	This is not a Comerica Impact Topic itself but elements are related to our Impact Topic of Regulatory Compliance & Public Policy. See 2024 Annual Report : Critical Accounting Estimates — Income Taxes (page F-38); Notes to Consolidated Financial Statements — Note 18 - Income Taxes and Tax-Related Items (pages F-87-F-89)
GRI 301: Materials 2016	Our Comerica Impact Topic, Environmental Resources Management, generally aligns with GRI 301: Materials. See Environment section.
301 Materials used by weight or volume	Key Metrics - Environment ; Reducing Paper, Waste and Water Impacts
301-2 Recycled input materials used	Key Metrics - Environment
GRI 302: Energy 2016	Our Comerica Impact Topic, Environmental Resources Management, generally aligns with GRI 302: Energy. See Environment section.
302-1 Energy consumption within the organization	Key Metrics - Environment CDP Climate Change Response
302-3 Energy intensity	Key Metrics - Environment
302-4 Reduction of energy consumption	CDP Climate Change Response

GRI Standard Disclosure and Requirements	Location
GRI 303: Water and Effluents 2018	This is not a Comerica Impact Topic itself but elements are related to our Impact Topic of Environmental Resources Management. See Environment section.
303-1 Interactions with water as a shared resource	Reducing Paper, Waste and Water Impacts CDP Climate Change Response
303-3 Water withdrawal	Key Metrics - Environment 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.
303-5 Water consumption	Key Metrics - Environment
GRI 304: Biodiversity 2016	This is not a Comerica Impact Topic.
GRI 305: Emissions 2016	Our Comerica Impact Topic, Climate Change, generally aligns with GRI 305: Emissions. See Environment section.
305-1 Direct (Scope 1) GHG emissions	Reducing GHG Emissions ; Key Metrics - Environment ; CDP Climate Change Response ; GHG Emissions Verification
305-2 Energy indirect (Scope 2) GHG emissions	Reducing GHG Emissions ; Key Metrics - Environment ; CDP Climate Change Response ; GHG Emissions Verification
305-3 Other indirect (Scope 3) GHG emissions	Reducing GHG Emissions ; Key Metrics - Environment ; CDP Climate Change Response ; GHG Emissions Verification
305-4 GHG emissions intensity	CDP Climate Change Response Key Metrics - Environment
305-5 Reduction of GHG emissions	Reducing GHG Emissions CDP Climate Change Response
GRI 306: Waste 2020	Our Comerica Impact Topic, Environmental Resources Management, generally aligns with GRI 306: Waste. See Environment section.
306-1 Waste generation and significant waste-related impacts	Reducing Paper, Waste and Water Impacts ; Key Metrics - Environment
306-2 Management of significant waste-related impacts	Reducing Paper, Waste and Water Impacts ; Comerica Shred Days Support Privacy ; Recycling and Food Banks
306-3 Waste generated	Reducing Paper, Waste and Water Impacts ; Key Metrics - Environment
306-4 Waste diverted from disposal	Reducing Paper, Waste and Water Impacts ; Key Metrics - Environment

GRI Standard Disclosure and Requirements	Location
GRI 308: Supplier Environmental Assessment 2016	This is not a Comerica Impact Topic itself but elements are related to Impact Topic of Responsible Sourcing. See Supporting Supply Chain Sustainability section.
308-1 New suppliers that were screened using environmental criteria	Supporting Supply Chain Sustainability
308-2 Negative environmental impacts in the supply chain and actions taken	Supporting Supply Chain Sustainability Key Metrics - Environment
GRI 401: Employment 2016	Our Comerica Impact Topics, Talent and Employment Practices, generally align with GRI 401: Employment. See Colleagues section.
401-1 New employee hires and employee turnover	Talent Attraction ; Key Metrics - Colleagues 2024 Annual Report : Item 1. Business — Human Capital Resources, pages 15-16
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Compensation and Benefits 2025 Proxy Statement : Proposal 3: Non-Binding, Advisory Proposal Approving Executive Compensation — Compensation Discussion and Analysis — Compensation Elements & 2024 Pay Actions — Other Benefits Programs and Compensation, pages 57-58 2024 Annual Report : Item 1. Business — Human Capital Resources, pages 15-16
401-3 Parental leave	Compensation and Benefits
GRI 402: Labor/Management Relations 2016	Our Comerica Impact Topic, Employment Practices, generally aligns with GRI 402: Labor/Management Relations. See Colleagues section.
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. Comerica does not have any employees under collective bargaining agreements.
GRI 403: Occupational Health and Safety 2018	Our Comerica Impact Topic, Health, Safety & Well-Being, generally aligns with GRI 403: Occupational Health and Safety. See Colleagues section.
403-6 Promotion of worker health	Compensation and Benefits
GRI 404: Training and Education 2016	Our Comerica Impact Topic, Talent, generally aligns with GRI 404: Training and Education. See Colleagues , Inclusion and Environment sections.
404-1 Average hours of training per year per employee	Key Metrics - Colleagues 2024 Annual Report : Item 1. Business — Human Capital Resources, pages 15-16

GRI Standard Disclosure and Requirements	Location
404-2 Programs for upgrading employee skills and transition assistance programs	Learning and Development; Growing Awareness to Build Empathy; Driving Sustainability Engagement and Awareness; Financial Education 2024 Annual Report : Item 1. Business — Human Capital Resources, pages 15-16
GRI 405: Diversity and Equal Opportunity 2016	Our Comerica Impact Topics, Diversity, Equity & Inclusion and Human Rights, generally align with GRI 405: Diversity and Equal Opportunity. See Inclusion and Human Rights sections.
405-1 Diversity of governance bodies and employees	2025 Proxy Statement : Executive Summary — Governance Overview and Corporate Citizenship, page 6 2024 Annual Report : Item 1. Business — Human Capital Resources, pages 15-16 Employer Information Report EEO-1
GRI 406: Non-Discrimination 2016	Our Comerica Impact Topic, Inclusion, generally aligns with GRI 406: Non-Discrimination. See Inclusion section.
GRI 407: Freedom of Association and Collective Bargaining 2016	This is not a Comerica Impact Topic.
GRI 408: Child Labor 2016	This is not a Comerica Impact Topic.
GRI 409: Forced or Compulsory Labor 2016	This is not a Comerica Impact Topic.
GRI 410: Security Practices 2016	This is not a Comerica Impact Topic.
GRI 411: Rights of Indigenous Peoples 2016	This is not a Comerica Impact Topic.
GRI 413: Local Communities 2016	Our Comerica Impact Topics, Community, Financial Education, Access & Inclusion and Responsible Investing & Financing, generally align with GRI 413 Local Communities. See Customers and Community sections.
413-1 Operations with local community engagement, impact assessments and development programs	Small Business Support; Financial Inclusion; Strengthening Our Communities; Supplier Engagement; Financial Education; Impact Teams; Volunteerism and Philanthropy; Reducing Paper, Waste and Water Impacts 2025 Proxy Statement : Executive Summary — Community in 2024, page 7 2024 Annual Report : page 3 of PDF
GRI 414: Supplier Social Assessment 2016	This is not a Comerica Impact Topic itself but elements are related to Impact Topic of Responsible Sourcing. See Supplier Engagement section.
GRI 415: Public Policy 2016	Our Comerica Impact Topic, Regulatory Compliance & Public Policy, generally aligns with GRI 415 Public Policy. See Responsible Business section.
415-1 Political contributions	Public Policy and Government Relations; Key Metrics - Responsible Business Political Activities and Contributions

GRI Standard Disclosure and Requirements	Location
GRI 416: Customer Health and Safety 2016	This is not a Comerica Impact Topic.
GRI 417: Marketing and Labeling 2016	This is not a Comerica Impact Topic itself but elements are related to Impact Topic of Customer Practices. See The Customer Comes First section.
417-2 Incidents of non-compliance concerning product and service information and labeling	For disclosure, if applicable, to material pending legal proceedings concerning non-compliance with laws and regulations, see the 2024 Annual Report : Financial Review and Reports — Notes to Consolidated Financial Statements — Note 21 - Contingent Liabilities, page F-91.
417-3 Incidents of non-compliance concerning marketing communications	For disclosure, if applicable, to material pending legal proceedings concerning non-compliance with laws and regulations, see the 2024 Annual Report : Financial Review and Reports — Notes to Consolidated Financial Statements — Note 21 - Contingent Liabilities, page F-91.
GRI 418: Customer Privacy 2016	Our Comerica Impact Topic, Privacy & Information Protection, generally aligns with GRI 418 Customer Privacy. See Enterprise Security and Privacy and Data Protection sections.
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Key Metrics - Responsible Business
Comerica Impact Topic: Innovation and Technology	Our Comerica Impact Topic, Innovation and Technology, does not align with a specific GRI disclosure. See Innovation and Technology section.
3-3 Management of material topics	Innovation and Technology ; Key Metrics - Customers
Comerica Impact Topic: Ethics and Reputation	Our Comerica Impact Topic, Ethics & Reputation, does not align with a specific GRI disclosure. See Business Risk Management (Key Enterprise Risks) section.
3-3 Management of material topics	<p>Human Rights</p> <p>Business Risk Management (Key Enterprise Risks)</p> <p>Comerica CDP Response</p> <p>2024 Annual Report: Item 1A. Risk Factors, pages 16-28</p> <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 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>
Corporate Responsibility Awards/Recognition in the reporting year	2024 Corporate Responsibility Recognition

GRI Standard Disclosure and Requirements

Location

Comerica Impact Topic: Transparency

Our Comerica Impact Topic, Transparency, does not align with a specific GRI disclosure. See entire [Corporate Responsibility Report](#), [2025 Proxy Statement](#) and [2024 Annual Report](#).

3-3 Management of material topics[Responsible Business](#)

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 \(ffiec.gov\)](#).

Number of years that Comerica has published an annual sustainability and/or corporate-responsibility themed report

[Responsible Business](#)**Comerica Impact Topic: Business Strategy and Resilience**

Our Comerica Impact Topic, Business Strategy and Resilience, does not align with a specific GRI disclosure. See [2025 Proxy Statement](#) — Executive Summary: Governance Overview and Corporate Citizenship (page 6) — Proposal 1: Election of Directors. Board Leadership Structure (page 18) and [2024 Annual Report](#) — Item 1A. Risk Factors (pages 16-28)

Comerica Impact Topic: Governance

Our Comerica Impact Topic, Governance, generally aligns with GRI 2 General disclosures 2-9 to 2-21. Please see these disclosures earlier in the GRI Index.

SASB Standards Content Index

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 provide 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 are 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	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	No		—
	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 and 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	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	2024 Annual Report (pages F-23-F-24, F-66)	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	

SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
	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 2023 Financed Emissions Update	—
Financed Emissions	FN-CB-410b.1	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	Yes	Reducing GHG Emissions 2023 Financed Emissions Update	Absolute financed emissions provided for Scope 1 and 2 (combined) and Scope 3. 2023 updated financed emissions provided as a total (not disaggregated)
	FN-CB-410b.2	Gross exposure for each industry by asset class	Partially	2023 Financed Emissions Update	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	2023 Financed Emissions Update	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	2023 Financed Emissions Update	
Business Ethics	FN-CB-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	2024 Annual Report (page F-91)	All legal proceeding expenses declared in Note 21
	FN-CB-510a.2	Description of whistleblower policies and procedures	Yes	Compliance and Ethics	—

SASB Topic	SASB Code	Accounting Metric	Disclosure Met?	Link or Direct Response	Comments
Systemic Risk Management	FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	No		
	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; 2024 Annual Report (pages 5, 22-23, F-28) 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	2024 Annual Report (page F-5); 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	2024 Annual Report (pages F-5, F-63) 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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