

Comerica's Human Rights Statement

Who We Are

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

Our Stance on Human Rights

Comerica supports the principles of human rights throughout all of our businesses and subsidiaries. Comerica is committed to maintaining a work environment where every colleague at every level is treated with dignity and respect, free from discrimination and harassment, and can devote their full attention and best efforts to the job. Comerica supports rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.

Additionally, Comerica supports and respects, protection and preservation of human rights as directed by the principles in the United Nations Guiding Principles (UNGP), which has three foundational parts:

- State Duty to Protect against human rights abuses through appropriate policies, regulation and adjudication.
- Corporate Responsibility to act with due diligence to avoid infringing on human rights and address adverse impacts.
- Access to Effective Remedy for victims of corporate-related abuse, judicial and non-judicial.

At Comerica Bank, 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 support the protection of the rights of individuals who have been historically disadvantaged in the workplace and in society, including the rights of women, individuals from underrepresented ethnic/racial backgrounds, people with disabilities and LGBT+ individuals. We are committed to our values.

Our Values

We live by our values that drive us daily that speak to the following:

- **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 diverse, inclusive and sustainable workplace, and world.
- **How We Deliver**
 - Trust, Act, Own
 - Everyone is empowered to do what's best for both our customers and colleagues.
 - Speak up, be heard and make things happen

Colleagues

[Comerica's Code of Business Conduct and Ethics](#) for colleagues is a values-based document, rather than compliance-based, which means it goes beyond a simple listing of right and wrong. Comerica's Code of Business Conduct explains in detail the ethical business practices and conduct that must govern our life here at Comerica.

Comerica has workplace policies that aim to promote diversity, equity, and inclusion and that outline a zero tolerance for harassment, intimidation, retaliation, or workplace violence, among other topics.

All colleagues are required to complete annual regulatory compliance training which includes but is not limited to Anti-Money Laundering, Business Conduct and Ethics, Information Security, HIPAA, Information Privacy and Protection, Sexual Harassment Prevention, Financial Exploitation of the Elderly or Dependent Adults, Complaint Management, Diversity, Equity and Inclusion and Active Shooter training.

Additionally, our diversity, equity and inclusion standards can be expressed in the following manner:

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

Customers

Comerica Incorporated places a high priority on protecting the personal information, including personal health information, of consumers, customers and employees as well as corporate sensitive information. This Policy describes our efforts to use and share this information responsibly.

This Policy applies to all employees of Comerica Incorporated, its subsidiaries and service providers engaged in business activities with Comerica. It is a key component of Comerica's Enterprise Information Protection Framework and was promulgated by Enterprise-Wide Compliance Committee in response to requirements contained in Title V of the Gramm-Leach Bliley Act, the Fair Credit Reporting Act, the Health Insurance Portability and Accountability Act of 1996, and implementing regulations, and other applicable state and federal laws.

Community

Comerica Bank is committed to providing information for public inspection under the [Community Reinvestment Act](#). As a federal law enacted in 1977, the CRA encourages financial institutions to reinvest in the communities it serves. The information on this site may be downloaded by any member of the public. For those who have limited or constrained internet access, please see the bottom of the page for information on how to obtain physical copies.

Comerica's success is dependent upon helping people succeed. This vision shapes our approach to community investment and guides the framework of our charitable support and community partnerships. The Comerica Corporate Contributions program and Comerica Charitable Foundation work to partner with the communities we serve through investments in education, economic and community development and human services for those in need. Comerica Bank and the Charitable Foundation support charitable 501 c 3 organizations that align with our priorities.

Third Party Suppliers and Partners

Comerica is committed to pursuing a supplier and third-party partner base that supports our values and we encourage the growth of enterprises owned by minorities, women, veterans, persons with disabilities and members of the lesbian, gay, bisexual, and transgender (LGBT) community through our Supplier Diversity program. Comerica believes an inclusive supply chain will provide the innovation, flexibility, and adaptability we need to meet and exceed the expectations of our customers. In addition, we hold all of our suppliers and third-party partners to the same high values, ethical business practices and human rights standards we hold ourselves to, because they are an extension of our organization and want to partner with companies that share our values.

Monitoring

Comerica's Workplace Harassment/Discrimination policy along with our Ethics and Compliance Hotline allow colleagues to report human rights violations or concerns to any level of leadership within the company, human resources, legal, or compliance. The confidential third party, The Network, receives the call through a toll-free number for the Ethics and Compliance Hotline. The Intake Specialist follows a script to record relevant information about the caller's demographics and the complaint, and then summarizes the information in a standard report format. The Comerica Employee Relations team will triage the case (from the Ethics Hotline) and depending on the nature of the case, will assign it to one of the groups identified below:

- An Employee Relations Consultant that supports the division
- Human Resources Consultant that supports the division
- If the case comes through the Compliance Hotline, Auditing will review the case and work with specific areas, i.e., Human Resources, Fraud/Investigations, Corporate Security, Corporate Legal in resolving the matter.

On an annual basis, summary details regarding Hotline activities are provided to Executive Leadership.

Governance

Comerica's Human Rights Policy Statement was developed by the Environmental, Social and Governance Council with input from a cross-functional group of colleagues across the company and external stakeholders. Comerica's ESG Council is responsible for providing strategic direction and oversight for Comerica's human right's work, including this policy statement. Comerica is committed to regularly reviewing this policy to ensure it remains in line with best practice, as well as the evolving expectations of our colleagues, customers and communities.

Additional policies:

[Equal Opportunity & Affirmative Action](#)

[Summary of Rights Under the Fair Credit Reporting Act](#)

[Comerica's Code of Business Conduct and Ethics](#)