

Environmental Policy Statement

Comerica's Commitment to the Environment

Comerica understands that protecting and preserving the environment is important to the health and well-being of the people, businesses, and communities we serve. We are therefore committed to incorporating environmental stewardship considerations into the ways we do business. We believe that the adoption of environmentally responsible practices will help us to become a stronger and more successful company and will enable us to create greater long-term value for our stakeholders – our investors, customers, employees, suppliers, and host communities – by reducing costs, reducing risks, increasing revenues, and enhancing our reputation as a good corporate citizen.

Climate Change

Comerica recognizes that there are growing concerns about the risks that climate change may pose to the stability of the environmental, social, and economic systems on which human societies depend. The regulation of greenhouse gas emissions in some jurisdictions in which we do business and the prospect of future regulation in others make this a business issue which we must take into account. Accordingly, Comerica is committed to taking appropriate steps to promote awareness of the risks and opportunities that may be associated with climate change and to adopting responsible behaviors and practices to mitigate the risks associated with global warming.

In furtherance of this commitment,

- We will measure, report, and seek to reduce our company's greenhouse gas (GHG) emissions over time.
- We will evaluate whether climate change risks may result in incremental credit risk in various portions of our loan portfolio as a consequence of the exposure of certain industry sectors or borrowers to the likely legal/regulatory, economic, or physical impacts of climate change. If necessary, we will develop appropriate strategies and tools to manage such risks.
- We will help our customers and suppliers to increase their awareness of both risks and opportunities that may arise from climate change developments.
- We will work to increase our employees' awareness of climate change issues and of the steps that they can take to mitigate or adapt to the effects of climate change in their own homes and communities.
- We will seek profitable opportunities to provide financial products and services which will assist our customers to more effectively manage their own impacts on climate change and the global environment.
- We will support public policy approaches to the management of climate change risks which harness the power of markets to create and implement cost-effective solutions.

Resource Conservation

Comerica recognizes that there are growing concerns that the demand for natural resources across the world cannot be sustained at current levels without damaging the global ecosystems which provide those resources. Significant long-term efforts to conserve natural resources and to improve the efficiency of their use will be needed. Comerica is therefore committed to adopting responsible behaviors and implementing practices to mitigate the risks associated with the unsustainable consumption of our natural resources.

In furtherance of this commitment,

- We will implement initiatives within our company to reduce, reuse, recycle, and re-think processes in ways that decrease our overall use of natural resources and our generation of wastes.

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- We will seek to reduce our consumption of paper. Where feature and performance requirements allow, we will maximize the use of paper products containing post-consumer recycled content. Where we must utilize paper products containing virgin wood fiber, we will endeavor to work with our suppliers to ensure that the paper is sourced from sustainably managed forests. As part of our Secure Document Destruction Program, we will recycle waste paper used or obtained in the process of conducting our business and operations.
- We will seek to reduce our consumption of water by deploying low-flow plumbing fixtures in our new banking center construction program and, where feasible, in renovated facilities which we own and control.
- We will seek to reduce our consumption of energy through both conservation and energy efficiency initiatives.
- We will expand our corporate recycling programs wherever possible to include aluminum, glass, and plastic beverage containers; cardboard; and electronic equipment.
- Where feature and performance requirements allow, we will give preference in our procurement processes to products and suppliers which demonstrate superior environmental performance in terms of resource consumption, waste minimization, and protection of vital ecosystems.
- We will construct new banking centers (i.e., built by Comerica from the ground up) in ways that are consistent with our commitment to environmental stewardship and our efforts to improve our long-term environmental performance.
- We will 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.
- We will seek to promote awareness among our customers, employees, and suppliers of opportunities to minimize the use of natural resources and the generation of waste.

Transparency and Accountability

Comerica recognizes that the successful implementation of this Environmental Policy will depend on a number of factors, including building awareness about our environmental commitments among our employees and being transparent and accountable to stakeholders for our progress over time.

To achieve these goals,

- We will seek to ensure that this Policy is implemented throughout our company by conducting awareness training of our employees over time and by providing guidance and assistance, as needed, to facilitate implementation.
- We will establish systems and procedures to track and assess our performance and will publish biennially a corporate sustainability report (as well as more limited annual updates in interim years) following recognized standards and utilizing performance metrics generally accepted as relevant and valid for companies in the financial services industry.
- Finally, we will engage periodically with external stakeholders to solicit their feedback about our corporate sustainability performance and about how it – as well as our reporting – can be improved.

By making the commitments articulated in this inaugural environmental policy statement, Comerica recognizes that it is only beginning the long and difficult journey toward a more sustainable future.

We value the trust and confidence of our stakeholders and pledge to work with them over time to make progress on the environmental sustainability challenges which all of us are determined to overcome in order to secure our common future.

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