

# 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%

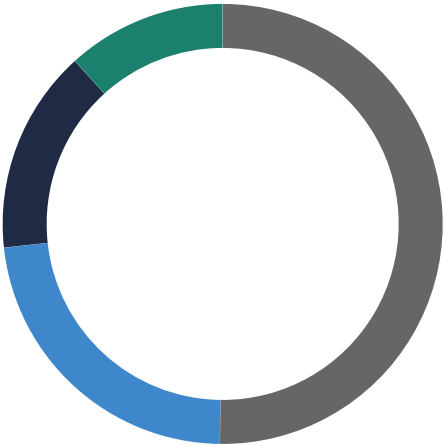
6-15 years

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	3,045
Bronze-level certified	Silver-level certified
2,559	1,645
Gold-level certified	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

#### Salam IT

CA, MI

#### Women's Forum IT

CA, MI, TX

CA - California

TX - Texas

MI - Michigan

#### Asian IT

CA, MI, TX

#### Veteran Leadership IT

MI

#### Mi Gente - Hispanic IT

CA, MI, TX

#### PRISM - LGBTQIA+ IT

CA, MI

“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	2022	2023	2024
<b>Financial Inclusion and Financial Education</b>			
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 <sup>18</sup>	445	476	483
Number of Access Checking customers (LMI customers) <sup>19</sup>	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

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

<sup>19</sup> Access Checking account has no monthly fee with \$250 direct deposit.