

Comerica Securities, Inc. Business Continuity Statement



At Comerica Securities, Inc. ("CS" or "Firm" or "Our"), we know that you rely on our systems and services for your capital markets needs. We also know that disruptions can occur and can affect your business with us. CS intends to continue critical business activities during significant business disruptions (such as tornadoes, blizzards, power outages, *etc.*). CS would like its customers to know that we have a plan in place to protect their information, and to provide critical services in the event of a significant business disruption. CS considers contingency planning to be an ongoing process, and therefore plans may change as necessary. Our business continuity plan is designed with flexibility to permit CS to resume business operations as soon as practicable, given the scope and severity of the significant business disruption.

Contingency Planning and Business Recovery

CS has developed plans that include the ability to recover from a variety of situations including, but not limited to, unplanned evacuations, power outages, severe weather, and facilities failures. The plans are designed to account for business disruptions of various lengths, severity, and scope (local, regional, or national) and address the Firm's ability to recover and/or provide business functions and information access according to their time criticality. Nevertheless, a disruption may affect capital markets' operations, which would delay our return to normal business operations.

Site/Business District/City-wide Disruptions (power-outage, weather emergency, site evacuation)

Our initial strategy involves employees working remotely using customary means of communication. In the event the remote work model is not sustainable due to the nature of the disruption, CS intends to relocate essential personnel to facilities that can provide support for critical business activities or to shift such activities, where possible, to geographic locations outside of the impacted area. Once the alternate facilities within the region have been accessed, Firm management will decide from where communications and business processes will originate. As noted, critical personnel also have remote access so they can work from home or other locations as deemed appropriate based on the nature of the disruption, including, depending on the scope of the disruption, the ability for customers to contact CS associates using existing business number(s).

Notification to Customers

Procedures for notifying customers as soon as practicable have been established in the event of an outage. Notification will be made via telephone, mail, email, website or a combination of these, as the Firm believes appropriate. Notification may include information regarding length of outage impact of the disruption on our operations, instructions for conducting business including alternative contact number(s), and other pertinent information.

Our Business Continuity Statement can be accessed by visiting comerica.com/securitiesbcs.

If you have any questions, please email us at ComericaSecuritiesCompliance@comerica.com.

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