

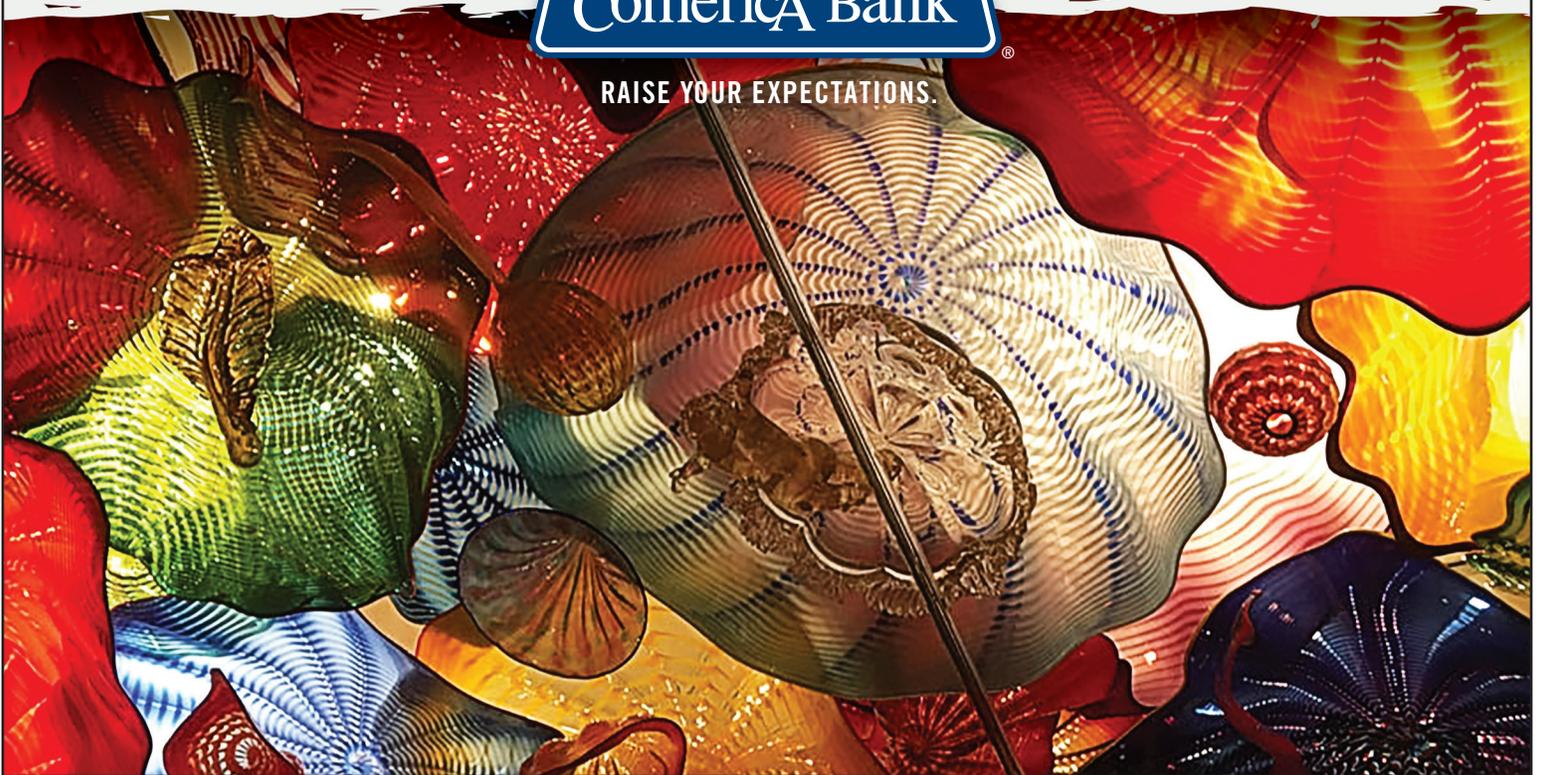


CORPORATE RESPONSIBILITY

An Update of Our Environmental and
Diversity & Inclusion Progress for 2017

Comerica Bank

RAISE YOUR EXPECTATIONS.®



The photos shown on our report cover were taken by Comerica colleagues as part of Comerica's annual Diversity Photo Contest Calendar for 2018.

Any statements in this document that are not historical facts are forward-looking statements as defined in the Private Securities Litigation Reform Act of 1995. Words such as “anticipates,” “believes,” “contemplates,” “feels,” “expects,” “estimates,” “seeks,” “strives,” “plans,” “intends,” “outlook,” “forecast,” “position,” “target,” “mission,” “assume,” “achievable,” “potential,” “strategy,” “goal,” “aspiration,” “opportunity,” “initiative,” “outcome,” “continue,” “remain,” “maintain,” “on track,” “trend,” “objective,” “looks forward,” “projects,” “models” and variations of such words and similar expressions, or future or conditional verbs such as “will,” “would,” “should,” “could,” “might,” “can,” “may” or similar expressions, as they relate to Comerica or its management, are intended to identify forward-looking statements. These forward-looking statements are predicated on the beliefs and assumptions of Comerica's management based on information known to Comerica's management as of the date of this document and do not purport to speak as of any other date. Forward-looking statements may include descriptions of plans and objectives of Comerica's management for future or past operations, products or services, including the Growth in Efficiency and Revenue initiative (“GEAR Up”), and forecasts of Comerica's revenue, earnings or other measures of economic performance, including statements of profitability, business segments and subsidiaries as well as estimates of the economic benefits of the GEAR Up initiative, estimates of credit trends and global stability. Such statements reflect the view of Comerica's management as of this date with respect to future events and are subject to risks and uncertainties. Should one or more of these risks materialize or should underlying beliefs or assumptions prove incorrect, Comerica's actual results could differ materially from those discussed. Factors that could cause or contribute to such differences are changes in general economic, political or industry conditions; changes in monetary and fiscal policies; whether Comerica may achieve opportunities for revenue enhancements and efficiency improvements under the GEAR Up initiative, or changes in the scope or assumptions underlying the GEAR Up initiative; operational difficulties, failure of technology infrastructure or information security incidents; reliance on other companies to provide certain key components of business infrastructure; Comerica's ability to maintain adequate sources of funding and liquidity; the effects of more stringent capital or liquidity requirements; declines or other changes in the businesses or industries of Comerica's customers; unfavorable developments concerning credit quality; changes in regulation or oversight; changes in the financial markets, including fluctuations in interest rates and their impact on deposit pricing; transitions away from LIBOR towards new interest rate benchmarks; reductions in Comerica's credit rating; damage to Comerica's reputation; Comerica's ability to utilize technology to efficiently and effectively develop, market and deliver new products and services; competitive product and pricing pressures among financial institutions within Comerica's markets; the interdependence of financial service companies; the implementation of Comerica's strategies and business initiatives; changes in customer behavior; management's ability to maintain and expand customer relationships; the effectiveness of methods of reducing risk exposures; the effects of catastrophic events including, but not limited to, hurricanes, tornadoes, earthquakes, fires, droughts and floods; the effects of recent tax reform and potential legislative, administrative or judicial changes or interpretations related to these and other tax regulations; any future strategic acquisitions or divestitures; management's ability to retain key officers and employees; the impact of legal and regulatory proceedings or determinations; the effects of terrorist activities and other hostilities; changes in accounting standards; the critical nature of Comerica's accounting policies and the volatility of Comerica's stock price. Comerica cautions that the foregoing list of factors is not all-inclusive. For discussion of factors that may cause actual results to differ from expectations, please refer to our filings with the Securities and Exchange Commission. In particular, please refer to “Item 1A. Risk Factors” beginning on page 11 of Comerica's Annual Report on Form 10-K for the year ended December 31, 2017. Forward-looking statements speak only as of the date they are made. Comerica does not undertake to update forward-looking statements to reflect facts, circumstances, assumptions or events that occur after the date the forward-looking statements are made. For any forward-looking statements made in this or in any other documents, Comerica claims the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995.

TABLE OF CONTENTS	
Report Sections	Page Number
Infographic: Corporate Responsibility at Comerica	4
Message from our Sustainability and Diversity Leadership	5
Our Company	7
The Comerica Promise and Our Core Values	8
Stakeholder Engagement and Relevancy Assessment	10
Demonstrating Comerica's Actions Toward the Sustainable Development Goals (SDGs)	11
Diversity and Inclusion	14
Leadership and Accountability	14
Our Workforce (Employee Demographics, Employee Diversity and Inclusion Engagement, Diversity Awareness & Learning, Attracting Diverse Talent)	16
Our Board	21
Our Customers	21
Our Community/Employee Involvement	22
Our Suppliers	23
Environment	26
Comerica's Environmental Sustainability Goals	27
Managing Environmental Impacts of our Operations (Climate Change, Energy and GHG Emissions, Material Consumption, Water Stewardship)	28
External Environmental Impacts (Green Lending, Environmental Risk Management, Reducing Environmental Impacts in our Supply Chain)	41
Employee Sustainability Engagement	48
Key 2018 Sustainability Priorities	50
Additional Information	51
Key Statistics Table	51
Reporting Methodology	58
GRI Standards Content Index	60

Corporate Responsibility at Comerica

\$439 MILLION in community and economic development loans, an **increase of 16%**



862,087 pounds of paper securely recycled at our community Shred Day events



29 microenterprise loan funds supported

\$140,000 given by Comerica to support hurricane disaster relief efforts in Texas and Florida



3 out of 10 of Comerica's independent directors are women



\$50,000 given by Comerica to establish a disaster relief fund for Comerica colleagues impacted by a natural disaster

\$15 PER HOUR Comerica's new minimum wage for colleagues



734 financial education training events sponsored by Comerica, reaching over 49,900 low- and moderate-income individuals



Signed Statement of Support for the National Guard and Reserve to act as advocates for employee participation in the military

\$64 MILLION in annual spend with diverse suppliers



\$832 MILLION in green loans and commitments



19 Market Segmentation Initiative Teams focused on reaching diverse customers, impacting **over \$300 million** of new account openings

\$7.9 MILLION DONATED OVER

donated to charitable organizations via more than 1,500 grants/sponsorships



68,000 HOURS NEARLY

of volunteer time donated to nonprofits by Comerica colleagues, worth **over \$1.6 million**

Data provided is for 2017, and all comparisons are to 2016 unless otherwise noted.

Progress on 2020 Environmental Goals vs. 2012 Baseline: 50% of Goals Achieved

28.9% REDUCTION IN GHGs



as of 2017 vs. 2020 goal of 20%

27.3% REDUCTION IN WATER CONSUMPTION

as of 2017 vs. 2020 goal of 30%

20.9% REDUCTION IN WASTE TO LANDFILL



as of 2017 vs. 2020 goal of 20%

46.6% REDUCTION IN OFFICE COPY PAPER USAGE

as of 2017 vs. 2020 goal of 50%

Visit www.comerica.com/sustainability to view Comerica's 2017 Corporate Responsibility Progress Report, including the sources of data listed above and more information on our corporate responsibility efforts.



Message from our Sustainability and Diversity Leadership



*J. Scott Beckerman
Senior Vice President and
Director of Corporate
Sustainability,
Comerica Incorporated*

Last year, we shifted the title of our annual report on Comerica's comprehensive environmental, social and governance (ESG) practices from *Sustainability* to *Corporate Responsibility* to better reflect the comprehensive nature of our reporting. In this Corporate Responsibility Progress Report, we provide updates on two of our key elements of corporate responsibility: [Diversity and Inclusion](#) and the [Environment](#). More information on a broad array of topics is available in our [Key Statistics Table](#) and summarized in our [Infographic](#).

We recognize that these two issues may seem disparate on the surface. However, much like nature itself relies on diversely populated ecosystems, Comerica knows healthy and sustainable environments require diverse and inclusive populations to thrive. The metaphor holds true for a thriving corporation and extends to the support we bring to sustain vibrant communities where we live, work and do business. We know we are only as strong as the communities we serve, and our drive for sustainability, diversity and inclusion are just a few of the ways Comerica continues to support the success of our communities.



*Nathaniel Bennett
Senior Vice President and
Chief Diversity Officer and
Head of Talent Acquisition,
Comerica Incorporated*

Comerica's overall approach to corporate responsibility remains rooted in value creation. In pursuing our approach, we define corporate responsibility as including interconnected environmental, economic, social and governance topics. It is an approach to conducting business in a manner that meets the current needs of all people, without compromising the ability of future generations to meet theirs. Annually, we look to continue to make progress in the areas of:

Knowledge & Innovation	Opportunities & Revenues
Training our colleagues to help further spur innovation within our operations	Seeking opportunities to support customers with diverse and sustainable financial solutions
Cost & Risk Reduction	Reputation & Brand
Reducing risks and costs associated with our operations	Maintaining our license to operate and enhancing our brand by considering our stakeholders' perspectives and "walking the talk" as a responsible corporate citizen

At Comerica, each and every colleague has a role to play in helping us be a more sustainable, inclusive and responsible company. The work we do as a responsible business naturally connects to the United Nations Sustainable Development Goals (SDGs) that represent a once-in-a-generation opportunity to align the interests of people, governments, businesses, and nonprofits around issues that can improve the lives of all people. This report provides some examples on how we are connecting the SDGs to our business operations and corporate responsibility efforts. For more information, please see [Demonstrating Comerica's Actions Towards the SDGs](#).

This report highlights not only the progress we've made, but the challenges we face when it comes to these complex and interdependent issues. As we continue to make progress, we are pleased with recognition we receive, including earning a perfect rating on the Human Rights Campaign's Corporate Equality Index for the fourth consecutive year, a listing for the fifth consecutive year on LATINO Magazine's "LATINO 100" list and for the third consecutive year, Comerica was ranked No. 2 on DiversityInc's 2017 Top Regional Companies for diversity. We have also recognized by Barron's as one of the 100 Most Sustainable Companies, achieved an A- rating by CDP for our climate change management strategy and emission reduction efforts, and were recognized with a Climate Leadership Award for Excellence in Greenhouse Gas Management. A summary of our 2017 awards/recognition are provided at the end of this message.

In an era where customers and stakeholders increasingly are expecting companies to speak out on social and environmental issues, we let our actions, as highlighted in this report, speak the loudest. It is yet another way we *raise your expectations of what a bank can be*. To learn more about corporate responsibility at Comerica, or to provide feedback on our reporting, please contact Scott Beckerman, Director of Corporate Sustainability, at jsbeckerman@comerica.com or Nathaniel Bennett, Chief Diversity Officer and Head of Talent Acquisition, at nbennett@comerica.com.

Key 2017 Awards and Recognition for Corporate Responsibility

Recognized by Points of Light as one of **The Civic 50**, a list of the top 50 most community-minded companies in the United States

Received **2017 Financial Capability Innovation Award** from EverFi at Nasdaq for Comerica's significant efforts to improve the financial capability of Americans through unique digital learning initiatives

One of the "**50 Best Companies for Diversity**" in 2017 by Black Enterprise Magazine

Earned a fourth consecutive perfect rating of 100 percent on the **Human Rights Campaign (HRC) 2017 Corporate Equality Index (CEI)**

Ranked on **LATINA Style 50 Report** at No. 26 in 2017, up from No. 32 in 2015.

Fifth consecutive listing on LATINO Magazine's 2017 "**LATINO 100**" annual list of the top 100 companies providing the most opportunities for Latinos

Ranked No. 2 on the DiversityInc **2017 Top Regional Companies for Diversity** for three consecutive years

Recognized by Women/Minority Business News as Corporate 101: **America's Most Admired Corporations for Supplier Diversity**

Received Great Lakes Women's Business Council **Best In Class designation for Supplier Diversity**

Named 41 on the San Francisco Business Times **Top 100 Corporate Philanthropy** list in Bay Area

Selected as **Silver-level Veteran-Friendly Employer** by the Michigan Veterans Affairs Agency (MVAA) based on 2017 progress

Provided with the **Corporate Leadership Award** from the Pacific Asian Consortium in Employment (PACE) at their 40th Year Anniversary Awards Dinner & Gala (California Market)

Recognized by the **Youth Business Alliance**, an LA-based non-profit organization that believes every child should be taught life skills education and have access to local businesses and professionals, for our support of the non-profit.

Partnered with the nonprofit organization, **Hermandad Mexicana Nacional (HMN)** in an effort to encourage and promote financial literacy.

Recognized by Barron's as one of the **100 Most Sustainable Companies in the U.S.**

9th consecutive year on **FTSE4Good Index** and continued listing on **Thomson Reuters Corporate Responsibility Indices**

Received a **Climate Leadership Award for Excellence in Greenhouse Gas Management** from C2ES and The Climate Registry

A- score on our CDP Climate Change response, among the top 16 percent of all financial services CDP responders

OUR COMPANY

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and is among the 25 largest financial holding companies in the United States. Comerica focuses on relationships, and helping people and businesses be successful. In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico.

For more than 168 years, our colleagues have focused on building long-term relationships and delivering the highest quality financial services. At year-end 2017, Comerica served almost one million customers. Comerica is strategically aligned into three business segments:

- **The Business Bank**, supporting companies with an array of credit and non-credit financial products and services.
- **The Retail Bank**, delivering personalized financial products and services to small businesses and individuals.
- **Wealth Management**, serving the needs of high net worth clients and institutions.

As of December 31, 2017, our total assets stood at \$72 billion, total loans at \$49 billion and total deposits at \$58 billion. Additional metrics are provided in the [Key Statistics Table](#) attached to this report and in Comerica's [2017 Annual Report](#).

For more information about our company, please visit the [Company Overview](#) section of Comerica.com.

Comerica At A Glance: 2017

<ul style="list-style-type: none"> • Among the 25 largest U.S. financial holding companies 	<ul style="list-style-type: none"> • Highest concentration of commercial and industrial (C&I) loans among the top 25 U.S. financial holding companies (as of 12/31/17)
<ul style="list-style-type: none"> • 437 U.S. banking centers and 589 ATMs concentrated in Michigan, Texas, California, Arizona and Florida (as of 12/31/17) 	<ul style="list-style-type: none"> • Located in seven of the 10 largest cities in the U.S.: Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose
<ul style="list-style-type: none"> • No. 3 pre-paid commercial card issuer 	<ul style="list-style-type: none"> • Approximately 8,000 employees

Comerica Strengths

Long History	Nimble Size (\$72 billion in Assets at 12/31/17)	Attractive Footprint	Relationship Banking Strategy	Conservative
Founded over 168 years ago	Products and services of a large bank with a culture of a community bank	Strong presence in Texas, California and Michigan	Trusted Advisor approach	Strong capital position, prudent credit underwriting

Comerica Bank Demonstrates Support for Employee Service in the National Guard and Reserve



Employer Support of the Guard and Reserve (ESGR) is a Department of Defense agency established in 1972 to develop and maintain employer support for Guard and Reserve service. Paramount to ESGR's mission is encouraging the employment of Guardsmen and Reservists who bring integrity, global perspective and proven leadership to the civilian workforce.

"Comerica's support of the National Guard and Reserve reaffirms our proud commitment to provide career opportunities to the brave men and women who serve our country. They bring leadership, discipline, initiative and unique problem-solving skills to the workplace, which make them ideally suited for a variety of professions. When companies hire our military members, we all benefit."



On November 2, 2017, Comerica Bank Texas Market President Peter Sefzik signed a Statement of Support for the National Guard and Reserve. The signing ceremony took place at the Comerica Bank Tower in Dallas, Texas. Mr. Sefzik was joined by Craig McKinley, ESGR National Chairman. The Statement of Support confirms Comerica Bank joins other employers in pledging:

- We fully recognize, honor and comply with the Uniformed Services Employment and Re-Employment Rights Act (USERRA).
- Our managers and supervisors will have the tools they need to effectively manage those employees who serve in the Guard and Reserve.
- We appreciate the values, leadership and unique skills service members bring to the workforce and will encourage opportunities to hire Guardsmen, Reservists and Veterans.
- We will continually recognize and support our country's service members and their families in peace, in crises and in war.

Peter Sekzik,
Comerica Bank Texas
Market President



"Today supportive employers are critical to maintaining the strength and readiness of the nation's National Guard and Reserve units. The ESGR Statement of Support program is the cornerstone of ESGR's efforts to gain and maintain employer support. The intent of this program is to increase employer support by encouraging participating employers to act as advocates for employee participation in the military. By meeting the Statement of Support criteria, Comerica Bank will stand proudly with their National Guard and Reserve employees who continue to answer our nation's call to defend our way of life. Their personal sacrifices are essential to the strength of our nation."

Craig McKinley, ESGR National Chairman

The Comerica Promise and Our Core Values

At its core, The Comerica Promise is to raise the expectations of what a bank can be. The Comerica Promise is an employee roadmap aligned with our vision and mission, to elevate our customer and colleague working relationships. The Comerica Promise includes a Customer Promise and a Colleague Promise — statements that describe the behaviors and values that define our culture and align with our code of conduct.

OUR MISSION

We will achieve balanced growth and profitability by delivering a higher level of banking that nurtures lifelong relationships with unwavering integrity and financial prudence.

OUR VISION

To become the highest performing, most respected and most desired bank in the markets we serve.

Comerica's seven **Core Values** underpin our Mission and Vision and are instrumental to fulfilling our promise. Our Core Values of **Customer-centricity, Collaboration, Integrity, Excellence, Agility, Diversity** and **Involvement** reflect our commitment to corporate

responsibility and are highlighted throughout this report. For example, our colleagues demonstrate **Involvement** as they participate in Green Office Team activities and volunteer in their communities and we strive to develop a workforce rich in **Diversity** as Comerica is regarded as a diverse employer of choice.

<i>Customer-centricity</i>	<i>Collaboration</i>	<i>Integrity</i>	<i>Excellence</i>	<i>Agility</i>	<i>Diversity</i>	<i>Involvement</i>
Our decisions will be based first and foremost on what is best for our customers.	We will work as a team to do what is right by our customers and our colleagues.	We will maintain the highest ethical standards through our honesty and transparency. We will honor our commitments and take personal responsibility for our actions.	We understand there are no trade-offs or short cuts on the road to success. We will strive for greatness through continuous self-improvement.	We aspire to become a company that fully embraces innovation as a means of driving ongoing growth and prosperity. We remain flexible and adaptable to change.	We will create an environment that celebrates the differences among our colleagues and customers, with the understanding that such differences make us a stronger company.	We embrace our critical role in the communities we serve and acknowledge that our success is intertwined with theirs. We will make sustainability a priority.

Living the Promise: Comerica Supports Hurricane Disaster Relief Efforts



Above photo: Comerica Michigan Market President Mike Ritchie, assisted by Comerica Board Member Reginald Turner, provides a check to the Detroit Police Chief James Craig for the Detroit Public Safety Foundation to supplement donations from our colleagues to support first responders in Houston.

When hurricanes hit Texas and Florida in 2017, Comerica responded to support our customers and colleagues in the affected areas. Comerica donated \$100,000 to the American Red Cross to assist with disaster relief efforts in the aftermath of Hurricane Harvey and made a number of other donations to support relief efforts in both the Houston area and Florida, including the Texas Women's Empowerment Foundation, Change Happens Houston, Neighborhood Recovery CDC in Houston, Blue Triangle Multicultural Association in Houston, Harry Chapin Food Bank of Southwest Florida and Children's Harbor, Inc. in Pembroke Pines, Florida.

In Houston alone, Comerica has over 450 colleagues and nearly 50 banking centers as well as other offices. To support these, and other employees, Comerica established a Colleague Disaster Relief Program. The program's core is a disaster relief fund with contributions from our company as well as individual colleagues who donate to support their co-workers in times of need. The program also provides additional paid time off, personal loans, and colleague-to-colleague volunteer support.

In our Michigan Market, our colleagues reached out to support first responder in Houston by donating much-needed supplies. Comerica was proud to help the Detroit Police Department fill a semi-truck that headed from Detroit to Houston to deliver the supplies.



Above photo: Comerica colleagues donate critical supplies to support first responders in Houston in the aftermath of Hurricane Harvey

"Supporting our colleagues and the communities we serve is our number one priority," said Ralph W. Babb Jr., Comerica's chairman and chief executive officer. "We recognize how natural disasters the scale of Hurricane Harvey can devastate communities. And, we want to help those affected by the destruction with immediate resources, as well as assistance during the restoration period."

<i>Hurricane Relief Efforts</i>			
Corporate donations totaling \$150,000	Donations to support first responders in Houston	Support of Customers through accommodations on fees and relaxed product limitations	Established Colleague Disaster Relief Program

Stakeholder Engagement and Relevancy Assessment

We understand that engaging with our stakeholders is critical for understanding the priorities of this diverse group and, since our inaugural sustainability report in 2008, Comerica has been reporting on the relative importance of economic, environmental, social and governance issues.

For a detailed description of how Comerica engages with stakeholders, our impact assessment process, and our impact matrix, please see our report titled, "[Environmental, Social and Governance Impact Assessment: Comerica's Stakeholder Engagement Process and Evaluation of ESG Topics](#)." This report details how and why we engage with stakeholders, provides example stakeholder issues, and discusses our impact assessment process. This includes our impact topics and their associated boundaries, Comerica's impact matrix and the relevant GRI Standards information supporting our process.

2017 Stakeholder Engagement Activity

In early 2017, we convened a meeting of third-party environmental, social, and governance (ESG) analysts, socially responsible investment (SRI) representatives and industry thought leaders at the New York Stock Exchange to share their expert insights. The goal of this engagement was to:

- Gain insights on how investors understand and use sustainability and ESG information,
- Validate Comerica's impact matrix and impact topics,
- Refine Comerica's future sustainability strategy and communications, and
- Develop and enhance external relationships and open doors to further stakeholder engagement and thought leadership.

This group provided specific feedback on two key areas: 1) Industry trends and outlooks, and 2) Comerica's sustainability strategy, performance and reporting (including our Impact Topics and Relevancy Assessment). Findings from our engagement are summarized below.



Comerica sustainability staff and some of the stakeholders participating in our 2017 engagement at the New York Stock Exchange

Industry Trends and Outlook	Comerica's Sustainability Strategy, Performance and Reporting
<i>Key Takeaways</i>	
Stakeholders want comparable ESG data and communications. Sustainability language is inconsistent with business terminology and between companies. This alienates key audiences and creates barriers to mainstream acceptance.	Stakeholders look for greater clarity on what is most important to Comerica and how a strong sustainability strategy connects to and drives business performance. While Comerica's impact assessment is substantial, a streamlined refresh can help to elevate strategy and future reporting.
Stakeholders see stronger material alignment in sustainability reporting, but a disconnect between sustainability strategy and business performance remains. Further alignment and integration of sustainability and business performance better demonstrates overall value to key audiences.	Comerica is a leader in disclosure, and stakeholders are impressed with the breadth and depth of content provided. There is an opportunity to streamline and reframe sustainability communications to target key audiences and align with financial disclosures.
ESG performance communications should be more than environmental sustainability. Social and governance topics are less easily quantifiable and often not afforded the same platform as environmental topics, regardless of relative significance.	Stakeholders prefer a more concise, streamlined report that is easy to navigate and that can be quickly benchmarked against peers.
<i>Bottom Line</i>	
Stakeholders see improvements in ESG data reporting and sustainability strategy across the board, but acknowledge there are gaps between the current ESG information available and what traditional investors seek.	Comerica has made strong headway in its sustainability performance and reporting, and is recognized by stakeholders as a leader among its peers. There is an opportunity to build on progress to date by streamlining materiality, integrating financial disclosures and targeting key audiences.
<i>How We Have Responded</i>	
Comerica was one of the first financial services companies in the United States to prepare a GRI Standards-based corporate responsibility report in 2017, demonstrating our commitment to transparent reporting using a globally recognized reporting standard.	We changed the name of our report from "Sustainability" to "Corporate Responsibility" to better reflect the depth of content. Our 2016 report (published in 2017) also better targeted specific audiences by grouping impact topics into seven key pillars. Finally, we updated our website to use the Corporate Responsibility (CR) term for our grouping of sustainability, diversity, volunteerism, and other CR elements.
This 2017 Corporate Responsibility Progress Report includes both environmental and select social updates.	Our 2018 stakeholder engagement work will include efforts to verify and streamline the number of impact topics.
Future engagement will be conducted with investors to better understand their corporate responsibility-related priorities and information needs	Enhanced our approach to communications on sustainability-related issues and plan further enhancements to complement our 2018 Corporate Responsibility Report (to be released in 2019).

Demonstrating Comerica's Actions Toward the Sustainable Development Goals (SDGs)

Since the fall of 2015, the United Nations 17 sustainable development goals (SDGs) have increasingly been used as a roadmap for businesses to demonstrate how they are meeting global development needs. Comerica recognizes our individual and collective efforts can have transformative impacts in assuring no one is left behind in a quest to improve the lives of all of our planet's inhabitants.

At Comerica, we realize the interdependent nature between our environment, society and its communities and businesses. Within this nested structure, the SDGs allow businesses to support communities and the environment, which in turn are vital for a healthy business climate.



Our 2016 Corporate Responsibility Report documented our initial efforts to map our report topics to the SDGs. In this progress report, we've taken a deeper dive on selected diversity and environmental-related SDGs to demonstrate how our work supports the SDGs and their corresponding specific targets.

<i>Comerica Corporate Responsibility Progress Report Topics</i>		<i>Comerica Example</i>	<i>Corresponding SDG Target</i>
Diversity and Inclusion		Financial literacy training is a key part of Comerica's volunteerism efforts and we provide this educational experience for children as well as adults, promoting lifelong learning. (see Our Community/Employee Involvement)	4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes.
		At Comerica, 66 percent of employees and 52 percent of officials and managers are women. (see Employee Demographics)	5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.
		Diversity is a Core Value at Comerica and we are committed to embracing inclusion of all, regardless of differences in beliefs, experiences, backgrounds or physical characteristics. (see Diversity and Inclusion)	10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.

Comerica Corporate Responsibility Progress Report Topics		Comerica Example	Corresponding SDG Target
Environment		Comerica has reduced water consumption 27.3 percent (vs. 2012), reducing our demands on the water supply. (see Water Stewardship)	6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity.
		Green lending at Comerica includes relationships with companies that are advancing renewable energy and the critical technologies and supporting services for this sector. (see Green Lending)	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.
		Comerica's Master of Sustainability Awareness program teaches colleagues about the impacts of climate change and motivates them to take appropriate climate action at home and at work. (see Employee Sustainability Engagement)	13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.
		Comerica's brownfield lending activities, particularly in waterfront areas supports the safe reuse of properties and helps limit pollution from land-based sources. (see Environmental Risk Management)	14.1 By 2025, prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution.
		Environmental Risk Management processes at Comerica help ensure environmental issues are managed appropriately. (see Environmental Risk Management)	15.a. Mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems.

DIVERSITY AND INCLUSION

Diversity and Inclusion Vision



At Comerica, Diversity is embracing an inclusive culture that recognizes, respects and is sensitive to the differences in our community. Welcoming and supporting colleagues of all backgrounds is a pillar of [The Comerica Promise](#) and is key to the way we conduct business. To further this commitment, we developed and published our [Diversity Commitment](#) statement. This highlights our Diversity Core Value and recognizes the behaviors, values and beliefs that support a work environment in which we celebrate the differences among our employees and embraces our critical role in the communities we serve.

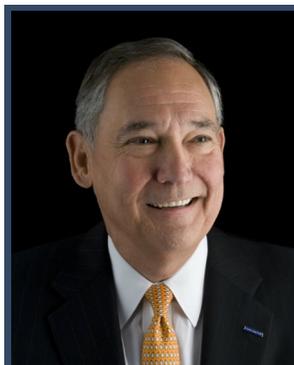
As one of Comerica's [Core Values](#), our respect for diversity permeates everything we do. Our diversity standards recognize behavior that:

- Uses and values similarities and differences in people to create a work environment that encourages creative thinking and solutions.
- 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.

We are dedicated to supporting and promoting diversity and inclusion, internally among our employees and leadership; and externally to our customers, suppliers and the communities where we conduct business.

2017 PROGRESS	Increased the number of military veterans in Comerica’s workforce by 18 percent since implementing our veteran outreach strategy, which included working with veterans' organizations and participation in career fairs.
	Continued growth for minorities in officer roles throughout the company.
	Improved diversity education and awareness opportunities through our Masters of Diversity Awareness Program, as well as a revamped required senior leadership training focused on implicit bias, to ensure improved inclusion throughout the bank.
	Increased outreach to diverse business owners through training and networking sessions as part of our supplier diversity program.
2018 CHALLENGES	Maintain spending levels on diversity-based suppliers even as expense initiatives reduce overall spending on contingent labor.
	Retaining minority talent long enough to elevate them to the senior most levels within the organization.

Leadership and Accountability



“We all know that when we truly reflect the demographics of our markets, we will better serve our customers, grow our business and build an even stronger organization. It makes good business sense.”

Ralph W. Babb Jr.
Chairman and Chief Executive Officer
Comerica Incorporated and Comerica Bank

Comerica supports diversity and inclusion through our Executive Diversity Council (EDC) comprised of Chairman and CEO, Ralph W. Babb Jr. and his leadership team. This demonstrates Comerica's commitment to diversity at the highest level of the corporation.

The EDC addresses important strategic issues relating to diversity and inclusion, including the attraction, retention, and development of diverse employees. The EDC provides guidance in tandem with the Chief Diversity Officer, Nathaniel Bennett, who leads the Diversity and Inclusion team responsible for setting direction of the diversity and inclusion strategy.

The EDC sets annual and long-term internal diversity goals focused on four strategic areas:

- Human Capital (diversity programs, talent acquisition and colleague development)
- Business Outreach
- Community Outreach (involvement and volunteerism)
- Supplier Diversity

All of Comerica's senior executives are required to include diversity in their performance plan and objectives throughout their lines of business. This is accomplished through a Diversity and Involvement Scorecard, which is required for each division. The scorecard, reviewed on an annual basis, outlines the division's diversity goals, focused on the four areas above and measures its progress in meeting these goals. Through this process, our EDC is able to set realistic, but challenging goals that move the company further along in improving the diversity of our workforce and the creation of an inclusive work environment along with a deeper commitment to our social responsibility focus.

Qualitatively, Comerica's senior executives and Diversity leadership team work to retrieve feedback from community leaders on how Comerica can further assist and grow our diverse communities. Our relationships with local Chambers of Commerce, nonprofit organizations and community leaders allow us to remain connected and continue to build on our strategy.

Our roadmap and strategic areas are integrated in the diagram on the next page:

<i>Diversity and Inclusion Strategy Roadmap</i>			
Satisfy Shareholders:	<i>Grow Revenue</i>		<i>Increase ROI</i>
Human Capital:	<u>Business Lines:</u>	<u>Diversity Teams:</u>	<u>Business Partners:</u>
Business Outreach:	"Increase Penetration of Target Markets"	"1:1 Relationship Building"	"Centers of Influence"
Community Outreach:	Support the community Social Value	Volunteer Resources Social Responsibility	Promotes Allies Links Target Markets
Supplier Diversity:	<i>Supports Business</i>	<i>Impact Community</i>	<i>Grow Community</i>

Our Workforce

Comerica's goal is to create a workplace where the best talent seeks employment. We know that diversity in the workforce will support our mission of helping people to be successful. Also, a diverse workforce will help by connecting us to a wider customer base, enhancing community relations, and enriching our pipeline of ideas and approaches to customer service.

Diversity has been an important priority for more than 20 years. As a result of that deep-rooted commitment, we have been recognized for our efforts and ranked among the best companies for diversity by national and regional publications. Associations concerned with corporate inclusion have ranked us highly during the eight years since we began submitting information.

Diversity and Inclusion Recognition

To help benchmark our diversity efforts, we participate in recognized corporate diversity rating surveys. These include:

- *DiversityInc*
- *Black Enterprise*
- Hispanic Association on Corporate Responsibility (HACR)
- *Hispanic Business Magazine*
- Human Rights Campaign's Corporate Equality Index (CEI)
- *Latina Style Top 50*

These rating organizations have consistently ranked Comerica among the top companies for diversity efforts. We also recently received our fourth consecutive CEI rating of 100 for our work to ensure inclusion of Lesbian, Gay, Bisexual and Transgender (LGBT) colleagues and community members. Comerica was also recognized in early 2018 as a silver-level veteran friendly employer by the Michigan Veterans Affairs Agency based on our 2017 progress.

Comerica is an equal opportunity employer and our policies, programs and practices align with this commitment. Respect for human rights is also critical to our business approach. We work to provide a diverse, inclusive, safe and ethical workplace. We do so by enforcing our employee [Code of Business Conduct and Ethics for Employees](#), equal employment opportunity statements and safety and health policies while maintaining a zero-tolerance approach to workplace corruption, discrimination and harassment. Comerica recently updated our Workplace Harassment and Discrimination policy and implemented an updated sexual harassment training for all employees.

As a federal contractor, Comerica also develops affirmative action plans to ensure equal opportunities for all colleagues. Comerica's [Equal Employment Opportunity Policy](#) statement includes sexual orientation and gender identity. The statement is reviewed and signed annually by the chairman and CEO, then made available to employees.

Employee Demographics

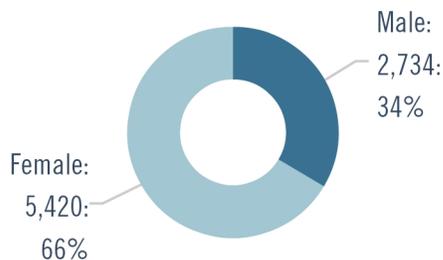
Our Workforce		
8,000 employees	5 major markets: Arizona, California, Florida, Michigan and Texas	Located in 7 of the 10 largest cities in the U.S. (Los Angeles, Houston, Phoenix, San Antonio, San Diego, Dallas and San Jose)

Advancing diversity in our workforce is a business imperative. In 2017, we continued our organization-wide focus to improve recruitment and retention of women and ethnic minorities especially in leadership positions through our diversity outreach, diversity awareness and learning program, and our leadership development programs.

2017 Workforce Diversity Metrics

Overall, the percentage of female employees working at Comerica has remained generally consistent since 2015 and are the majority portion of our population at 66 percent. Additionally, over half (52 percent) of our Officials and Managers are females. The Officials and Managers metric is developed utilizing manager-level EEO-1 reporting categories.

Females Overall*

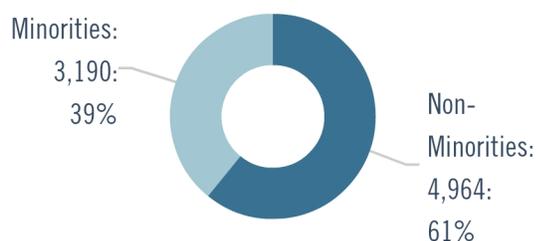


Female Officials and Managers*

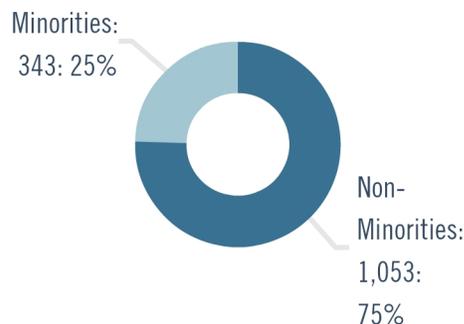


The percentage of ethnic minority employees working at Comerica has increased from 38 percent in 2016 to 39 percent in 2017. Our Officials and Manager population is made up of 25 percent ethnic minorities.

Ethnic Minority Overall*



Ethnic Minority Officials and Managers*



*Data as of 12/31/2017.

Comerica also tracks additional metrics including generation and tenure. From a generational perspective, Gen X makes up the largest group of employees at 39 percent of our workforce. Additionally, while 42 percent of Comerica's workforce has between zero and five years of service, Comerica's workforce is also highly tenured with 33 percent of our employees with 16 or more years of service. As the Millennial population continues to grow in the workplace, Comerica is sensitive to generational differences and work style. We offer various diversity training programs that address these differences and how employees can more effectively work together.

<i>Generation and Tenure Metrics</i>				
Generation	Traditionalist: <1%	Baby Boomer: 33%	Gen X: 39%	Millennial: 28%
Tenure	0-5 Years: 42%	6-15 Years: 25%	16-25 Years: 17%	26+ Years: 16%

Pay Equity

We believe that businesses play a critical role in reducing the national pay gap affecting women and minorities. We are committed to identifying and promoting the best practices to reduce unconscious bias, and making hiring, promotion and compensation decisions to stimulate pay equity. Accordingly, Comerica periodically performs a compensation analysis (looking at the main components of compensation, like salary and bonus) by grade level and position to ensure similar positions are paid comparatively to the extent other factors can be equalized (i.e. time in position, performance, education, etc.). There are significant differences in job functions from the division to the individual level across our diverse organization. Given these differences, aggregated data on pay without detailed accompanying context makes broad comparisons difficult. We have engaged with outside consultants to study this issue, and have evaluated our metrics and practices. Our equal pay initiatives, as part of our broader diversity and inclusion strategy, make our company stronger and deliver value to our shareholders. Additionally, Comerica made an enterprise-wide decision to prohibit the solicitation of salary history from applicants in all of our markets.

Employee Diversity and Inclusion Engagement

We encourage employees to form employee resource network groups (ERNGs) comprised of colleagues with common interest. ERNGs are usually formed for support, discussion and networking, as well as awareness building.

Comerica's Employee Resource Network Groups

To meet our human capital and business development goals, we conduct targeted recruitment activities and support 17 ERNGs. ERNGs are self-initiated, organized groups consisting of employees with common interests and the willingness to apply those interests to support Comerica on a variety of business issues. ERNGs are open to any employee, regardless of identity, background or organizational unit and provide peer networking, mentoring and development opportunities.

ERNG categories, some of which are located in multiple markets, include: Comerica African American Network (CAAN), Hispanic Ambassadors, Comerica Asian Indian Association, LGBT and Allies Alliance, Veteran's Leadership Network, Women's Forum, Quantitative Professionals and Young Professionals Networks.

Comerica ERNGs work to enhance the value that members bring to the company by leveraging their abilities to further recruit, develop and retain talent. They also provide a sounding board for issues of concern to the ERNGs. The impact of the ERNGs extend beyond our colleagues by supporting efforts to promote volunteerism, and other positive initiatives in the community.



Comerica Hispanic Ambassadors celebrate success in outreach and participation at annual recognition events.

Diversity Awareness and Learning

We encourage our colleagues to embrace and celebrate each other's differences and require that they complete diversity education courses to foster an atmosphere of inclusion in the workplace. We feature our diversity program in our employee orientation and require annual employee diversity learning. In 2017, this learning program focused on military veterans in the workplace and in previous years some examples of the topics we focused on were generations and LGBT and allies in the workplace.

Comerica's intranet site features articles about nationally-recognized diversity months that celebrate the rich cultures and traditions celebrated in our communities, such as Black History, Hispanic Heritage, Women's History and Pride, among others.

In addition, our company-wide Master of Diversity Awareness (MDA) program, developed by Comerica colleagues, achieved an 88 percent enrollment in 2017. The MDA program covers nine dimensions of diversity through a variety of activities, and has created a healthy competition to earn bronze, silver, gold, and platinum status for achievement of different learning levels.

Year-End 2017 Status: Number of Colleagues Who Achieved MDA Level Certifications*			
5,301	4,180	3,332	1,961
Bronze-Level Certified Colleagues	Silver-Level Certified Colleagues	Gold-Level Certified Colleagues	Platinum-Level Certified Colleagues
* Cumulative (e.g., colleagues who are MDA Gold-Level certified are also included as certified at the Bronze- and Silver-Level)			

Comerica has specific learning and awareness opportunities focused on veterans for our managers and employees through the *Military 101 Introduction to Hiring Military Candidates* training, which is available through our MDA Program. This year, Comerica launched a new *Interviewing Military Veterans* training for all managers and employees involved in the hiring process. This training specifically targets the benefits of interviewing and hiring veterans.

Additionally, Comerica emphasized the importance of hiring and supporting individuals with disabilities. In 2017, a training was provided to our entire Talent Acquisition and Human Resources team on how to source, interview, accommodate and position candidates with disabilities.

Comerica's colleague-focused Local Diversity Awareness Round Tables (LDARTs) provide a local resource for diversity learning. LDART members represent the interests and needs of colleagues across a given market. The LDART members plan, communicate and execute diversity learning options for colleagues in the market.

Comerica Celebrates Diversity Events

Comerica Celebrates Diversity



Comerica's Diversity and Inclusion Department, LDART teams and ERNG teams partnered and launched monthly diversity celebrations with the theme "Comerica Celebrates Diversity." These celebrations are offered within our major markets, including California, Michigan and Texas. The goal of these celebrations is to support diversity awareness and appreciation. In an effort to ensure an inclusive workplace and enriching work life, these monthly celebrations offer a large array of opportunities to learn about, participate in and experience different heritages and cultures.

The months and heritages that will be recognized in 2018 are: Black History Month in February, National Women's History Month in March, Asian Pacific Heritage Month in May, LGBT Pride Month in June, National Hispanic-Latino Heritage Month in September/October, National Disability Employment Awareness Month and Diversity Awareness Month in October, and Veterans Day in November.

In addition to specific diversity awareness and learning, Comerica also has an organizational emphasis on development and promotional opportunities for females and minorities. Internally, Comerica offers two programs: a Leadership Development Program (LDP) and an Emerging Leader Program (ELP), which provides development training for high potential employees that not only enhances their individual skills but also helps to strategically develop the organization as a whole. The LDP strengthens the quality of the Bank's leadership pipeline and is a component of the company's strong succession planning strategy. Additionally, the ELP is designed as a thoughtful and strategic mechanism to develop a diverse, sustainable, and enduring leadership pipeline that aligns to Comerica's core values and relationship culture. A critical component of these programs is to ensure diversity among the employees who are nominated into these programs.

Two additional programs that are offered to employees include the Inforum program, and the Mentium Momentum program. Momentum focuses on leadership skills and provides structured interaction with peers who have similar developmental interests and goals, plus formal business-education sessions. Inforum is offered to female employees in Comerica's Michigan market at three different career levels: NextUP Leadership for early career, Genuine Leadership Presence for vice presidents, and Executive Leadership for experienced vice presidents and senior vice presidents.

Attracting Diverse Talent

Diversity is an integral part of our attraction, recruitment and promotion efforts, which include built-in fundamental practices to ensure diversity in the pipeline. We work hard to attract and retain the best talent from all backgrounds. Our Diversity Recruiting Strategy delivers a qualified diversity applicant pool that reflects the demographics of our markets through a focus on women, minority populations, LGBT and Allies, veterans and individuals with disabilities.

In an effort to support diverse recruiting in 2017, Comerica developed a relationship with The Alumni Society, which is a membership-based organization for mid-to-senior-level Latino leaders who are alumni of the most competitive colleges and universities. Additionally, Comerica continued our relationship with Association for Latino Professionals for America (ALPFA), a professional association dedicated to enhancing opportunities for Latinos in accounting, finance and related positions. Comerica continued our long-standing relationship with the Arab Community Center for Economic and Social Services (ACCESS). Comerica has also maintained a strong relationship with the Department of Rehabilitation/National Employment Team Vocational Rehabilitation, GettingHired, U.S. Chamber of Commerce Hiring our Heroes and the U.S. Department of Veteran Affairs to recruit veterans and individuals with disabilities.

Outreach to Individuals with Disabilities

Comerica continued our partnership with GettingHired, an organization focused on outreach to individuals with disabilities, to further our reach and expand our branding to the disabled community. In 2016, GettingHired recognized Comerica as a featured employer. In 2017, GettingHired conducted disability inclusion training for our Human Resources Department and others within the organization.

Comerica participates in outreach and recruitment efforts to hire undergraduate and graduate talent. We have a variety of development programs designed to help recent college undergraduate students develop the skills and experience necessary for a successful career. Representatives are on campuses in the spring and fall across several of our primary geographical markets.

Outreach to Historically Black Colleges and Universities (HBCU)

In 2017, Comerica established a partnership with two HBCUs to increase our outreach to the African American student population. Comerica developed a partnership with Howard University and Florida A&M University in 2017 to further our reach and expand our brand to recruit and attract talent into our early career programs in Technology and Commercial Banking.

Comerica has an active veteran's recruitment strategy, which is communicated regularly to HR professionals, hiring managers, and executives. Several veteran-specific strategies and practices to attract veteran talent include connecting with the Veteran Leadership Network ERNG and the Veteran Market Segmentation Initiative (MSI) team for veteran referrals, implementation of veteran-friendly job qualifications, creation of a veteran-friendly recruitment handout and specific relationships with local and regional veteran

representatives. In addition, as highlighted in the [Our Company](#) section, Comerica has provided support on a national level for the Employer Support of the Guard and Reserves (ESGR). Comerica’s national signing publicly emphasizes our support of Guard and Reservists and advocates for employee participation in the military.

Our Board

Comerica strives to have a diverse Board that represents the interests of Comerica’s four core constituencies: its shareholders, its customers, the communities it serves and its employees. The Governance, Compensation and Nominating Committee considers diversity in assessing potential director nominees. For example, the committee seeks nominees with a broad range of experience, professions, skills, geographic representation and/or backgrounds. Nominees are not discriminated against on the basis of race, religion, national origin, sexual orientation, disability or any other basis as proscribed by law. In 2017, Comerica added one additional director who is a female.

2017 Board Composition		
10 of the 11 Comerica Board members are independent.	One director is Hispanic, two are African American, and eight are Caucasian.	Three of Comerica's directors are female and eight are male.

Our Customers

Comerica's diversity efforts also extend to our customers through our seven Comerica Market Segmentation Initiative (MSI) Outreach Group categories:

- African American
- Asian (Pacific, South Asian and Indian)
- Hispanic
- Middle Eastern
- LGBT and Allies
- Veterans and Military
- Women

Our MSI teams, which operate across our primary markets, pursue strategies to meet the banking needs of minority, female, LGBT, veterans and women business owners and professionals. The teams also establish relationships with relevant business and community leaders and organizations.

Each team is supported by business unit leaders and has an outreach budget to conduct financial education programs in partnership with relevant business associations, professional associations and nonprofit organizations serving these often "underbanked" communities. Examples include programs on lending for small businesses, cybersecurity, wealth building and basic financial literacy.

2017 Diverse Customer Outreach in Action		
The Texas Women’s MSI team held business networking events designed to help women professionals and business owners expand their networks and build success.	Michigan MSI teams joined with Comerica procurement to support minority business owners at the National Minority Supplier Development Council conference in Detroit. Comerica leaders shared best tips on building capital and securing contracts for new business.	California teams supported a number of professional associations, including the National Arab American Professionals Network of Orange County (NAAPOC), supporting cultural interests and building relationships.

In 2017, 19 MSI teams were operating across our markets. The efforts of our MSI teams in total garnered more than \$300 million in new account openings from business referrals.

Supporting our Customers

MSI teams host special events where business owners and professionals can network and get information that supports their business and personal financial success. Examples include invitations to the 23rd Annual Negro Leagues Tribute Game at Comerica Park and an exclusive networking event for North Texas businesswomen.

Our Community/Employee Involvement

Involvement is a Core Value of Comerica because we recognize that our success is intertwined with the prosperity of the communities we serve. We encourage our colleagues to share their time and expertise in order to support our commitment to the communities in which we operate.

Our volunteer programs support objectives for success by improving the lives of individuals, groups and the communities in which we do business through volunteerism, building and managing relationships and strategic partnerships. Our volunteers give generously of their time and talent, by participating on boards, conducting financial literacy training and providing service to help make local communities better places.

We strive to be a community leader in our key markets through our colleagues' volunteering and board participation. Comerica's employee volunteer program provides opportunities for colleagues to give back to the community. Each primary market has a Local Community Involvement Coordinator, who works with our National Employee Volunteer Program Manager to ensure that volunteering goals are met and that we follow best practices. We set annual goals for volunteer hours in each community where we operate. Managers lead by example and encourage other colleagues to do the same.

Supporting our Community



Comerica Cares volunteers and families working with Habitat for Humanity in Dallas.



Comerica Cares volunteers support The Children's Center in Detroit sharing their creativity by helping create a new library.



Over 50 Comerica Cares volunteers and their families in San Jose prepare for a coastal cleanup of the Guadalupe River.

Since 2011, our Donate 8 initiative has challenged colleagues to spend eight hours or more of personal time per year on community service activities. In order to encourage colleagues to record their community volunteer hours, we updated the program in 2014 to provide incentive for participation. In 2017, colleagues who recorded a minimum of eight hours were entered into a drawing to win a gift card, and those who recorded over 100 hours received signed certificates of appreciation from their respective market presidents. We also encourage senior managers to participate on community nonprofit boards.

2017 Comerica Employee Volunteering Numbers

67,967 Hours	2,039 Volunteers	\$1.64 million Approximate worth of employee volunteer time
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Last year, our company-wide goal was 64,000 employee volunteer hours — equivalent to eight hours per employee. Approximately 26 percent of our employees recorded volunteer hours in 2017.

Volunteerism has been an important priority for Comerica for many years. As a result, we have been recognized for our leadership in volunteerism outreach and program efforts.

Our Recognition	
Financial Services Roundtable-Corporate Responsibility Leadership Award	Comerica was named one of the top financial service companies for Corporate Social Responsibility by the Financial Services Roundtable (FSR), a leading financial services trade association. Comerica was one of 28 companies to receive the FSR Corporate Social Responsibility Leadership Award for its leadership to improve communities and improve Americans' financial literacy skills.
Points of Light-The Civic 50 List	The Civic 50, an initiative of Points of Light, the world's largest organization dedicated to volunteer service, recognizes a list of the top 50 most community-minded companies in the United States, including Comerica. The award sets a national standard for superior corporate citizenship and showcases how companies can use their time, skills and other resources to improve the quality of life in the communities where they do business. It is the third time Comerica has been named to this prestigious list since 2012 and our first listing in consecutive years.

Please review the Employee Sustainability Engagement section of the CR Progress Report for more details on how we engage our employees on the topic of environmental sustainability.

Our Suppliers

Comerica is committed to supporting the communities we serve. This includes an ongoing effort to enhance local and regional business success through proactive efforts to engage with diverse suppliers. Our Supplier Diversity Program provides capable, diverse businesses with an equitable opportunity to supply us with goods and services.

Comerica recognizes independent businesses that are at least 51 percent owned, operated, and controlled by U.S. citizens who are members of one or more of the following groups:

- Ethnic minorities: African American, Hispanic American, Native American, Asian Pacific American and Asian Indian American
- Disabled individuals
- Women
- Veterans
- Lesbian, Gay, Bisexual and Transgender (LGBT)

We establish annual supplier diversity spend goals based on our projected discretionary spend. We track spending with our diverse suppliers quarterly to ensure we meet our goals. Our Corporate Purchasing Department includes a senior-level Supplier Diversity Manager, who works with regional contacts to identify and support diverse vendors. For contracts originating in 2017, our goal was to spend \$57.4 million of this discretionary spend with diverse suppliers. This goal was lower than our 2015 and 2016 goals due to overall expense reduction initiatives.

Diverse Supplier Discretionary Spend			
Year	2015	2016	2017
\$ Millions	110.0	102.4	64.1
Discretionary Spend Goal Progress	Goal exceeded all three years		

We also ask our Tier 1 strategic supply partners, as identified by our business units, to support our supplier diversity initiatives by achieving, at minimum, 25 percent diverse sourcing from their suppliers. We monitor their performance during regularly scheduled

business reviews. We achieved \$19.5 million through our Tier 2 supplier diversity reporting in 2017, a decrease compared to our 2016 spend, consistent with our overall ongoing expense reduction efforts.

Comerica's standard Request for Proposal (RFP) language for sourcing opportunities includes questions concerning supplier diversity. Comerica's National Supplier Diversity Manager reviews supplier lists for each sourcing opportunity to ensure that, where possible, diverse firms are included. In 2017, 49 percent of RFPs tracked included diverse suppliers. Of that, 13 percent were awarded to diverse suppliers.

2017 Supplier Diversity Recognition	
<i>Best In Class designation for Supplier Diversity by the Great Lakes Women's Business Council</i>	<i>Recognized by Women/Minority Business News as Corporate 101: America's Most Admired Corporations for Supplier Diversity</i>

Comerica works closely with advocacy organizations to increase our outreach efforts with ethnic minority-owned businesses. Partners include the regional Minority Supplier Development Councils (MSDCs) in Michigan, Dallas/Fort Worth, Southern California and the Western Region, which includes Northern California, San Diego and Arizona. We are also active with local and national ethnic business associations including the Michigan Hispanic Chamber of Commerce, the Asian Pacific American Chamber of Commerce (APACC) and the Detroit Black Chamber.

Outreach to Veteran-Owned Businesses
During 2017, we increased our outreach to veteran-owned businesses by partnering with the National Veterans Business Development Council (NVBDC). Comerica participated in the Veterans Business Matchmaker hosted by the Federal Reserve of Chicago-Detroit Branch. In addition, Comerica participated in the NVBDC's Annual Conference held in Detroit, and hosted an informational table to talk with Veteran Business Enterprises about how to do business with Comerica.

To support access to our business for women-owned firms, we partner with the Great Lakes Women's Business Council and the National Association of Women Business Owners Greater Detroit Chapter in Michigan, among other regional chapters. Comerica staff serve on boards and committees for many of these organizations and we participate in trade fairs and networking events that help diverse business owners access our procurement decision-makers. During 2017, we also co-hosted training seminars for diverse businesses with the Michigan and Dallas/Fort Worth MSDCs and held webinars for our women-owned suppliers.

Michigan Minority Supplier Development Council	
	<p>Comerica is a corporate member of the Michigan Minority Supplier Development Council (MMSDC), and was honored to host the kick-off-session for the MMSDC's Women's Mastermind Sessions in March. More than 40 women-of-color entrepreneurs attended the event at Comerica's Detroit headquarters to hear from the Mastermind Sessions facilitator Dr. Joe Johnson.</p>

Comerica hosted the APACC/Comerica Symposium in August with Peter Sorrentino, Comerica's Chief Investment Officer, and Tel Ganesan, Managing Director of Kyba Xcelerator and President of TiE Detroit, an entrepreneurship group. Sorrentino covered current economic trends with a focus on the changing nature of the U.S. global trade and its impact on currencies, commodities and productivity, while Ganesan focused on the impact of economic trends on the business owners' day-to-day.

Comerica Supplier Diversity in Action

The National Minority Supplier Development Council's Annual Conference was held in Detroit in 2017. Gloria Oldani, Senior Vice President Purchasing, facilitated a Chief Purchasing Officer (CPO) panel discussion on "Insights from the CPO Suite: The Financial Services Supply Chain of the Future" as a part of the symposium hosted by the Financial Services Roundtable on Supplier Diversity. This symposium attracted more than 120 MBE attendees and featured CPOs from Guggenheim Partners, Keycorp, Fifth Third Bank, and the PNC Financial Services Group.



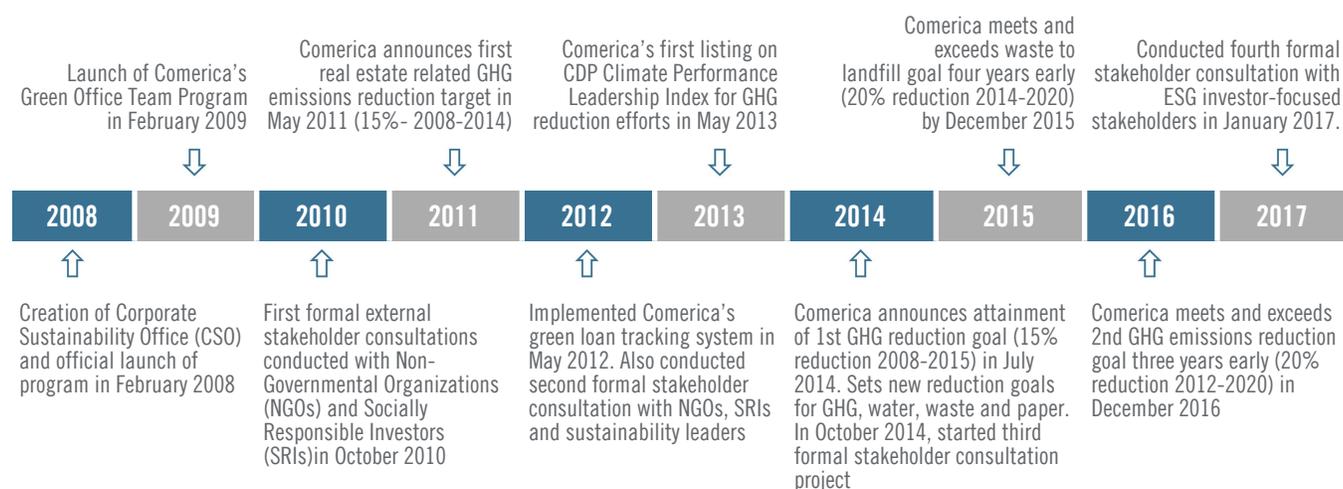
ENVIRONMENT

We understand conservation and efficient use of natural resources are key to a sustainable future and the increasing global demand for natural resources cannot be sustained without damaging the global ecosystems which provide those resources. Comerica is committed to adopting responsible behaviors and implementing practices to mitigate the risks associated with the unsustainable consumption of our natural resources, as highlighted in our [Environmental Policy Statement](#).

Each year, we track the progress of our most relevant environmental sustainability topics, including our greenhouse gas (GHG) emissions, water, waste, paper, environmentally-beneficial (green) lending, environmentally responsible procurement and sustainability engagement/communication.

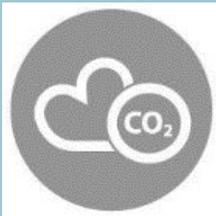
2017 PROGRESS	Having exceeded our GHG real estate emissions reduction target three years early in 2016, we continued to reduce our real estate Scope 1 and 2 emissions by an additional 8.4 percent over 2016 (28.9 percent reduction since 2012).
	Reduced our office copy paper consumption by 18.7 percent over 2016 (46.6 percent reduction since 2012) and we are on track to meet our 50 percent paper reduction goal by 2020.
	Reduced our water consumption by 27.3 percent since 2012, within 2.7 percent of achieving our 30 percent water reduction goal.
	35 percent of Comerica's discretionary spend on goods and services has been screened for environmental sustainability as of 2017.
2017 CHALLENGES	As of year-end 2016, we had reduced our waste to landfill by 28 percent and achieved our waste to landfill reduction goal in 2015. However, while still achieving our 20 percent reduction goal, our waste to landfill increased by 9.9 percent in 2017 versus 2016.
	Our coded green loans decreased by 11 percent over 2016 (and 23 percent since inception of green loan coding in 2012).
	We saw a nine percent decrease in the average sustainability score of the group of suppliers scored in 2017.

Environmental Sustainability Program Timeline



Comerica's Environmental Sustainability Goals

The pursuit of environmental sustainability is embedded into our corporate culture and day-to-day operations. We manage issues relating to environmental sustainability in our operations and supply chain through our Corporate Sustainability Office, cross-functional teams, operations-related departments and our senior-level Sustainability Council. The Council sets our sustainability strategy and goals and consists of senior leaders from the following divisions/departments: Retail Bank, Business Bank, Wealth Management, Purchasing, Real Estate, Human Resources, Investor Relations, Information Services, Enterprise Risk, Environmental Risk, Corporate Communications, Corporate Legal and Marketing. The Enterprise Risk Committee of the Board of Directors approves the sustainability strategy on an annual basis. We develop and execute an annual action plan to ensure we continue making environmental sustainability progress.

Comerica's Qualitative Environmental Sustainability Goals				
				
Reduce our impact on the environment from GHG emissions	Decrease the amount of materials consumed and business waste disposed at landfills	Use our water resources wisely	Raise the environmental performance of the products and services we purchase	Seek and report on additional green lending opportunities that meet Comerica's credit standards

Our Quantitative Short-to-Medium Term Environmental Sustainability Goals

Since 2009, we have developed two generations of GHG emissions reduction goals associated with our real estate portfolio. The first-generation reduction goal was set in 2009 (15 percent by 2015 vs. 2008) and was exceeded a year prior to the end of the goal period in 2014. We set our second-generation GHG emissions reduction goal as well as goals for water, waste and paper reduction in 2014. We met our waste reduction goal four years early in 2015 and our second-generation GHG emissions reduction goal three years early in 2016. As of year-end 2017, we are much closer to meeting our water and paper reduction goals.

Comerica's 2020 Environmental Sustainability Goals		
2020 Reduction Goals (2012-2020)	Percent Cumulative Reduction (2012-2017)	
Reduce real estate GHGs by 20%	28.9%	 Exceeded goal three years early!
Reduce Water Usage in metered facilities by 30%	27.3%	2.7% additional reduction needed to reach goal
Reduce operational-related Landfilled Waste by 20%	20.9%	 Exceeded goal four years early!
Reduce Office Copy Paper Consumption by 50%	46.6%	3.4% additional reduction needed to reach goal

Our New GHG Reduction Goals

Having achieved both our first generation 15 percent GHG reduction goal and our second generation goal of 20 percent early, we've set new GHG reductions goals. These goals are intended to be reflective of short, medium and long-term time horizons. We expect to continue to reduce our GHG emissions through activities such as improving the efficiency of our buildings, leveraging technology, the greening of the electric grid and potential deployment of renewable energy over the longer term.

We have maintained a baseline of 2012 for comparison, as our company's operational footprint and real estate portfolio have remained relatively constant since that time. As with our previous generation GHG reduction goals, the GHG emissions covered by our new goals are our Scope 1 and 2 real estate-based emissions.

<i>Comerica's New Third-Generation GHG Reduction Goals</i>	
<i>Year:</i>	<i>Percent GHG Reduction:</i>
By 2025	50%
By 2030	65%
By 2050	100%

On average, these GHG goals will drive reductions averaging three percent annually, a figure generally considered to be in line with science-based GHG reduction targets. Goals are considered “science-based” if they are in line with the level of decarbonization required to keep global temperature increase below 2°C compared to pre-industrial temperatures, as described in the Assessment Report of the Intergovernmental Panel on Climate Change (IPCC).

While we understand the significance of Scope 3 GHG emissions, we do not believe the data supporting our industry's Scope 3 emissions is sufficiently robust as to set goals around this scope of GHG emissions. In particular, there is not currently industry consensus around Category 15 (Investments) Scope 3 emissions nor is reliable data on customer emissions widely available. Comerica will continue to monitor developments around Scope 3 emissions goal setting, particularly in our industry, and determine if these types of goals may be appropriate in the future.

Managing Environmental Impacts of our Operations

Operational environmental impacts include GHG emissions, water use, and waste generation, as well as the procurement of the goods and services needed to operate our business. Our Corporate Sustainability Office evaluates and manages these risks and opportunities in collaboration with the business units who are responsible for specific operations, such as Corporate Real Estate and Corporate Purchasing. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight.

Each quarter, we complete a detailed report to track our environmental Key Performance Indicators (KPIs) and progress against our reduction goals. The KPI report tracks utility-related water and energy use along with data for other reported sustainability-related activities including corporate travel, paper, waste, refrigerants, and various other value chain activities. Trends are analyzed and reported to our Corporate Real Estate leadership, the Corporate Sustainability Office and the Sustainability Council, which includes the Chief Financial Officer, who is the executive sponsor of Comerica's Corporate Sustainability Program. Key statistics are also relayed to the Facilities Management and Engineering teams to keep them informed of their facilities' performance and company progress toward our environmental goals.

The Corporate Real Estate and Facilities Management teams also manage environmental issues. These include issues such as indoor air quality, asbestos, lead-based paint and mold. When concerns arise, we follow relevant industry and regulatory procedural guidelines. Incidents are tracked and reported to the company's Environmental Health Committee, which meets quarterly to evaluate new concerns and determine company-wide and site-specific protocols.

Climate Change, Energy and GHG Emissions

Comerica recognizes there are growing concerns about the risks that climate change may pose to the stability of the environmental, social and economic systems on which our societies depend. We use our value creation approach to sustainability to manage the risks and opportunities that are presented by a changing climate. As an example, reducing energy use and GHG emissions brings multiple environmental and business benefits. We believe higher-performing buildings help us to create a more desirable workplace and thus, improve employee retention and attraction, customer appeal, and company profitability.

Climate Change

Our [Environmental Policy Statement](#) outlines our commitment to reduce climate change business risks while identifying new business opportunities that help mitigate the impacts of rising global temperatures. Climate change risks associated with operational impacts are generally handled by the Corporate Sustainability, Corporate Real Estate and Corporate Purchasing offices. These climate-related operational risks include GHG emissions, water use and waste generation, as well as the procurement of the goods and services needed to operate our business. Climate-related opportunities include lending to environmentally beneficial, or "green," companies and projects, as well as reducing our own costs and risks and enhancing our reputation and brand. Comerica's Sustainability Council, which includes leaders from across the organization, also provides input and oversight on the management of these risks and opportunities.

Since 2007, we have annually disclosed our emissions strategy and reduction efforts through CDP's climate change questionnaire. In 2017, Comerica received our second consecutive A- Leadership score, which put us in the top 16 percent of 2017 financial services responders. Please see our most recent [CDP Response](#) for more information on our strategy and recent progress in addressing climate change risks and opportunities.

Previous GDP Climate Leadership Recognition (2008-2017)

	Climate Performance Leadership Index	Listed two times (2013 and 2014)
	Climate Disclosure Leadership Index	Listed five times (2008-2011, 2015)
	Climate Leadership Level	Listed in 2016 and 2017 with A- score

Energy Management

The majority of our direct GHG emissions result from energy used to operate our buildings, so minimizing our GHG emissions footprint depends upon reducing energy consumption. Efficiently managing our energy use is important to the bottom line as energy is one of Comerica's larger corporate operating expenses. In 2012, we introduced a company-wide, systematic approach, through which we identify energy improvement opportunities and review operational practices for enhanced energy efficiency.

In 2017, we continued to make significant progress in reducing our energy use while carefully managing our financial resources to maximize the impact of our investments. Comerica decreased its direct and indirect energy consumption by 8,074 MWh, or 6.4 percent, compared to 2016. The reductions were primarily a result of energy efficiency projects, which included the installation of new building management system (BMS) controls, new smart thermostats, and new LED lighting. While the LED lighting upgrades were completed at 28 targeted facilities, the new BMS controls and thermostats were installed at nearly all of the locations where Comerica is responsible for utilities. Additional energy reductions were also a result of reducing occupied square footage from the Comerica real estate portfolio.

Key Highlights: 2017 Energy Management

Implemented two comprehensive projects to provide significant reductions in our energy usage:



An enterprise-wide Building Management System/Smart Thermostat project to provide remote diagnosis, monitoring, and programming controls for HVAC systems at 337 Comerica locations where we maintain operational control and have direct energy bill payment responsibility (274 of the projects were completed in 2017 with an additional 63 projects completed in early 2018).



A targeted LED lighting upgrade project to replace existing lighting with energy-efficient LED options at 28 of Comerica's facilities (26 of the projects were completed in 2017 with an additional two projects completed in early 2018).

Other Energy Management Projects and Initiatives:

Completed energy efficiency-focused site visits at 46 Comerica facilities. Site visits were completed at 33 locations where energy efficiency upgrades were occurring and energy efficiency recommendations provided for 13 banking center locations with upcoming renovations planned for 2018.

Continued the Mission Control Team's Comprehensive Management Plan for our data centers, including management of the data center power usage and power quality through sub-metering controls program (Geist Power Metering), which helps to track energy consumption patterns and trends following implementation of energy conservation measures

Continued company-wide Temperature Standards Policy with set-point and set-back temperature standards for spaces where Comerica maintains operational control over heating, ventilation and air conditioning (HVAC) systems

Implemented our re-imagined office layout at five CoWork locations [San Jose and Los Angeles, California and Lansing and Ann Arbor (two locations), Michigan]

Continued implementation of the Dormant Space Policy to help minimize energy usage within properties with unoccupied space

Removed approximately 214,028 square feet (-4.3 percent) of occupied real estate space in 2017 vs. 2016

Project Highlight: LED Lighting



Above: Before LED Project



Above: After LED Project

New LED lighting was installed at 26 locations in 2017, which replaced inefficient metal halide fixtures, reduced wattage and improved light levels. These projects resulted in \$17,500 energy savings during 2017 as the projects were implemented in the latter half of the year. Annual energy savings from the new lighting projects are anticipated to total over \$100,000. For exterior projects, photo-metrics were completed to verify standards were being met and opportunities for optimizing layouts were identified. The completed LED lighting projects are anticipated to reduce lighting maintenance costs as well as energy consumption.

Total Energy Consumption



Project Highlight: BMS Early Successes

From February - December 2017, we installed building management systems (BMS) at 155 Comerica properties to update heating, ventilation, and air conditioning controls and provide more energy efficiency. The new controls allow greater access and control. This can all be done remotely, which reduces response and maintenance costs. Comerica's vacant and dormant spaces are also controlled through these remote systems. These installs utilize technology to simplify connecting additional equipment in the future and can also be used to provide business resiliency. Through the first three quarters of 2017, the first 100 BMS system installations helped Comerica to save \$158,000 in energy costs compared to the average of the previous 3 years at these facilities.



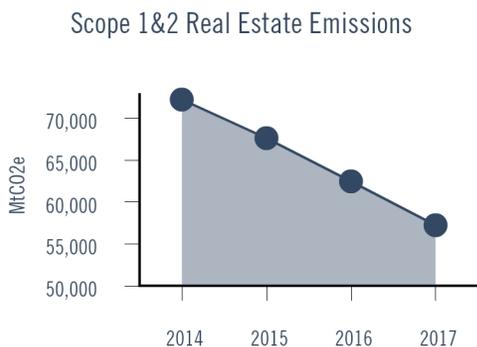
GHG Emissions Management

As part of our longstanding commitment to reducing our carbon footprint, we track and publicly report on our GHG emissions. We follow the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard (Revised Edition) to account for and calculate Scope 1 and 2 GHG emissions from our operations. In addition, we follow the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard to account for and calculate our Scope 3 GHG emissions. We obtained independent, third-party verification (limited assurance level) for our Scope 1, Scope 2 and Scope 3 GHG emissions in 2017. For more detailed information on Comerica's GHG emissions, covering gases included, the verification letter and methodologies used in our Scope 1, 2 and 3 GHG calculations, please refer to our most recent [CDP Response](#).

Real Estate Emissions (Scope 1 and 2)

After exceeding our previous 15 percent real estate GHG reduction goal in 2014, we committed to reduce real estate-related GHG emissions by an additional 20 percent by the end of 2020 over 2012 levels. This second generation GHG emissions reduction goal was achieved in 2016 and we have made additional reductions since 2016. We have now set [new GHG goals](#) that will help us drive further reductions in Scope 1 and 2 real estate-related GHG emissions.

Scope 1 and 2 Real Estate Emissions Trend



In 2017, we reduced our Scope 1 and 2 real estate GHG emissions by 5,232 MtCO₂e, or 8.4 percent, compared to 2016 (15 percent reduction over 2015). Comerica's Scope 1 Corporate Real Estate activities (natural gas, diesel, refrigerants) decreased by 138 MtCO₂e, or 2.4 percent in 2017 vs. 2016. Comerica's Scope 2 emissions decreased by 5,094 MtCO₂e in 2017 vs. 2016 (a 9.0 percent reduction). The reductions in metered and estimated electricity usage were the largest components of the Scope 2 decrease. The real estate emissions decreases in 2017 were primarily related to the following:

- 300 energy and sustainability improvement projects implemented at Comerica locations in 2017
- Rationalization, Consolidation, and Closure (RaCC) real estate projects completed at 54 Comerica locations in 2017

Scope 1 and 2 Real Estate Emissions 2020 Reduction Goal Progress



Our 2017 real estate-related Scope 1 and 2 emissions decreased by 23,304 MtCO₂e (28.9 percent) over the 2012 baseline total of 80,533 MtCO₂e. Based on this reduction, we met our second-generation real estate GHG reduction goal three years early, and we are currently at 145 percent of the 2020 goal.

Comerica Accepts Climate Leadership Award

In March 2018, Comerica was recognized for excellence in greenhouse gas emissions management. The Climate Leadership Awards, sponsored by C2Es and The Climate Registry, took place during the Climate Leadership Conference, which brought together forward-thinking leaders from business, government, academia, and the non-profit community to address climate change through policy, innovation and business solutions. Specifically, Comerica was recognized with a Goal Achievement Award for exceeding our second-generation GHG reduction goal and in doing so, reducing GHGs by more than 20 percent ahead of a target date of 2020.

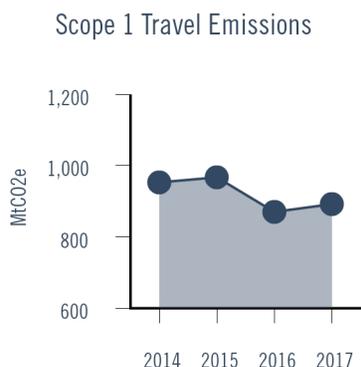
In Photo to Right: Comerica's Senior Sustainability Officer, Kristin Bloser (2nd from left) and Comerica's Director of Corporate Sustainability, Scott Beckerman (3rd from left) accept the 2018 Climate Leadership Award for GHG Goal Achievement on behalf of Comerica with representatives from the award sponsors (C2ES and The Climate Registry).



Travel Emissions (Scope 1)

As a relationship-based bank, travel is a critical part of our business. We track and manage Scope 1 emissions from our fleet vehicles and corporate jet.

Scope 1 Travel Emissions Trend



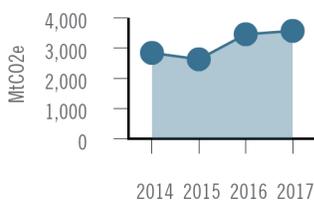
Comerica's Scope 1 travel (fleet, corporate jet) activities increased slightly by 22 MtCO₂e, or 2.5 percent over 2016 (but was still 7.8 percent under 2015's total). Our fleet emissions decreased 8.3 percent over 2016 while our corporate jet emissions increased by 5.0 percent due to increased corporate jet travel, which was partially offset by a reduction in employee ground travel, in 2017.

In recognition of the GHG footprint from our owned vehicles, Comerica elected to offset 100 percent of the emissions of our fleet and corporate jet for 2017, totaling 892 MtCO₂e. Our carbon credits to offset these emissions are for the Southex Greenwood Farms landfill gas capture project in Tyler, Texas, and certified by The Climate Action Reserve (CAR).

Value Chain (Scope 3) Emissions Trend

We provide emissions data for nine of the 15 Greenhouse Gas Protocol's *Corporate Value Chain (Scope 3) Accounting and Reporting Standard* categories for Scope 3 emissions. Below are some highlights and discussion of changes in our Scope 3 emissions.

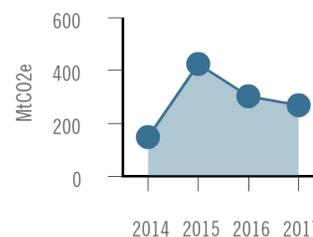
Purchased Goods & Services Emissions



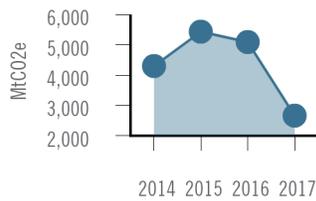
Our total 2017 purchased goods and services emissions increased three percent over 2016. We saw a five percent decrease in paper and computer emissions and a 100 percent increase in carpet emissions (based on a 21 percent increase in carpet purchases over 2016 and more accurate emission factor data, which resulted in higher carpet product emission factors).

While our 2017 calculated furniture emissions decreased compared to 2016, this was primarily related to some furniture purchases moving to different vendors who only have emission factor data for a portion of their product lines. We saw an 89 percent increase in furniture purchases in 2017 due to office renovations to our new efficient CoWork office layout, so our emissions likely would have increased overall if we had been able to calculate all furniture emissions. Our 2017 furniture emissions estimate covers 46 percent of total furniture spend (vs. our 2016 emissions estimate, which covered approximately 90 percent of 2016 spend).

Capital Goods Emissions



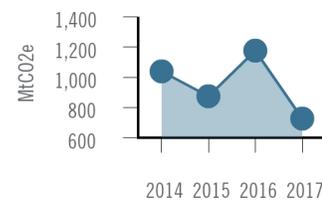
Electricity Distribution Line Loss Emissions



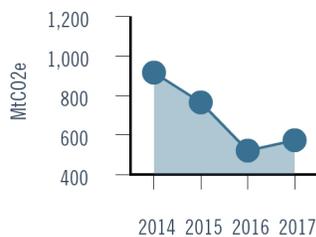
Our 2017 calculated electricity line loss-related emissions decreased by 2,424 MtCO₂e, a 48 percent decrease. The reduction was primarily due to significant reductions in the eGRID 2014 line loss emission factors (17 to 46 percent reduction over eGRID 2012 emission factors) as well as a 6,365 MWh reduction in electricity usage at Comerica in 2017 compared to 2016.

We saw a 38 percent decrease in upstream transportation and distribution emissions in 2017 over 2016. We reduced the amount of FedEx packages shipped by 43 percent (2017 vs. 2016). Additionally, one of our armored vehicle couriers reported a 38 percent decrease in the amount of diesel fuel used in 2017, which reduced our emissions by 38 percent since our emissions estimate is based on a percentage of their overall diesel emissions.

Upstream Transportation & Distribution Emissions



Landfilled Waste Emissions



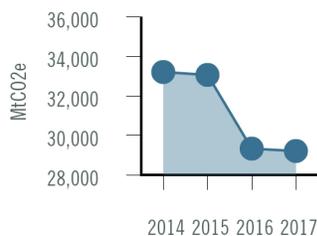
Our 2017 landfilled waste emissions increased by 10 percent versus 2016 due to a 10 percent increase in our waste sent to landfill. This increase was primarily related to increased waste pickups needed to accommodate the closing of facilities under the RaCC program and building renovations as additional personnel were moved into existing sites, requiring cleaning out of excess furniture and related office equipment.

Our 2017 employee-related business travel emissions remained relatively flat compared to 2016 (0.2 percent increase). We saw an 18 percent increase in our air-related emissions, which was offset by a 10 percent decrease in our employee personal vehicle-related emissions and a six percent decrease in rental car-related emissions.

Employee Business Travel Emissions



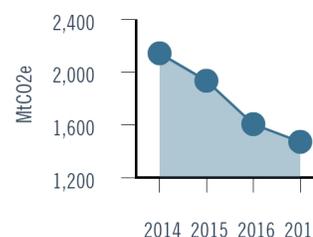
Employee Commuting Emissions



In 2017, our employee commuting emissions remained relatively flat (0.2 percent decrease versus 2016). We had 1,706 colleagues respond to our December 2016 questionnaire, a 21 percent response rate and we extrapolated the emissions to cover the entire employee population. Among our survey respondents, a percentage of employees indicated that they work from home or walked, ran, or biked to work and those employees helped to avoid 511 MtCO₂e of employee commuting emissions. To help encourage ride sharing, last year we established an Employee Commute Share site on our company intranet to help connect colleagues who would like to share a ride to work. Additionally, we offer a pre-tax commuter transportation program, which offers all benefits-eligible employees the option to lower their taxable income and the cost of getting to work by using pre-tax dollars to pay for transit passes for bus, train or Metro, transportation in a commuter vanpool, parking costs for park and ride facilities and train station parking.

Our 2017 downstream leased asset emissions (including our subleased corporate jet and subleased electricity and natural gas emissions) were down eight percent over 2016. We saw a 54 percent decrease in subleased corporate jet emissions, 39 percent decrease in subleased natural gas, 14 percent decrease in subleased metered electricity, 11 percent decrease in subleased estimated natural gas/propane for heat, and five percent increase in subleased estimated electricity emissions. The decreases were largely due to space consolidation and lease expirations in the subleased portfolio, which decreased by 3,086 square feet compared to 2016.

Downstream Leased Asset Emissions



Other Downstream Emissions (CBRE Fleet Only)



In 2017, we saw a 3 percent decrease in our CBRE fleet emissions associated with the Comerica account versus 2016. CBRE's large fleet emissions decreased by 4 MtCO₂e while its medium fleet emissions decreased by 1 MtCO₂e.

For more details on Comerica's Scope 3 emissions calculations and trends, please see our most recent [CDP Response](#). For historical GHG emissions data, see the [Key Statistics Table](#) in this report.

Material Consumption

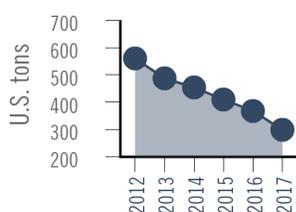
We are committed to recycling and reducing operational wastes. Managing our consumption and waste directly benefits Comerica through direct cost savings and reduced waste collection and disposal costs. Reducing our consumption of materials and their associated wastes resonates with our colleagues. Comerica has three main solid waste streams: paper, electronics and general office waste. An intermittent waste stream consisting of excess furniture, office equipment and some construction-related materials can be generated during office renovations or RaCC projects.

Paper

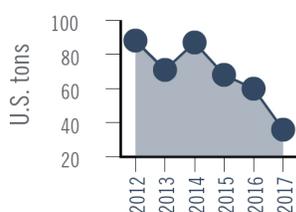
We continue to look for ways to reduce inefficient print processes across Comerica. We track paper purchases across the bank, including office copy papers, rolled papers, statement papers, envelopes, business cards and marketing papers. We use paper purchase data as a proxy for our paper consumption. Our paper vendors provide us with the total quantity of paper purchased by paper type, recycled content and paper certified to the Forest Stewardship Council (FSC) standard. Paper quantities and environmental attribute trends are measured on a quarterly basis so that, if needed, we can alter our paper purchase procedures to meet our reduction and environmental attribute goals.

In 2014, we set a goal to reduce our office copy paper consumption by 50 percent by 2020 compared to a baseline year of 2012. Additionally, we have set an internal annual office copy paper goal to have close to 100 percent of our office copy papers be at least 30 percent post-consumer recycled (PCR) content and FSC-certified, as feasible. We also use recycled content paper, wherever possible, based on paper attribute needs and cost considerations.

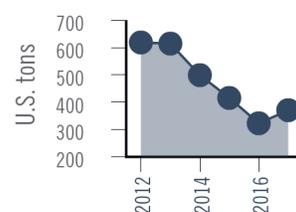
Office Copy Paper Consumption



Marketing Paper Consumption



Other Office Paper Consumption



Comerica's Consumer Loan Process Becomes More Efficient



Our previous Consumer Loan Application process required our banking center colleagues to print and then fax customer loan applications to our Consumer Loan Center (CLC) for review. In addition, the faxed documents required someone in the CLC to manually sort the documents for document storage. To improve this outdated process, Comerica's Technology Department installed a system in 2017 called Autostore.

This innovative solution allows customer-provided documents to be scanned in at a banking center and automatically electronically routed to the appropriate departments for review, allowing the CLC to work towards a paperless process. Autostore indexes the documents into the proper document type in our centralized imaging system where documents can be viewed and processed. The system sends an email to specific departments to let them know that a new document has arrived for their attention and an email confirmation to the sender to confirm receipt.

This new solution is anticipated to save over 1,000 pieces of paper per day and has improved our customer service as well as our loan application turnaround times, since the new solution has taken an average of 10-15 days off the application process. Now that Autostore is installed at Comerica, there is potential for the solution to be used by other departments interested in eliminating paper, reducing mailing costs and/or speeding up service to our clients.

In 2017, we reduced our total paper consumption by 44 tons (or 5.8 percent), office copy paper consumption by 69 tons (or 18.7 percent) and marketing paper consumption by 24 tons (or 39.3 percent) compared to 2016. Our other office paper consumption

increased by 49 tons, or 15 percent over 2016, primarily due to increases in our statement/rolled paper purchases, but is still 247 tons (or 40 percent) lower than our 2012 consumption.

Progress Against Our 2020 Office Copy Paper Reduction Goal



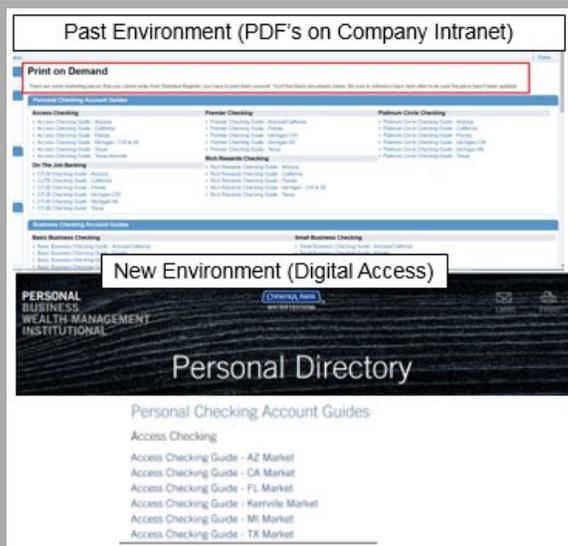
From 2012-2017, we reduced our office copy paper consumption by 261 short tons, representing a 46.6 percent overall reduction in office copy paper. The key reductions were related to a continued focus on our managed print services operations, working to reduce inefficient paper processes, allowing colleagues and their managers to assess their individual print progress data and expanding wireless networking and software solutions to support colleagues with paperless meetings.

We are on track to achieve our paper reduction goal, needing to reduce paper usage by an additional 3.4 percent by year-end 2019. For the complete breakdown of our 2017 paper quantity, recycled content and intensity metrics, please see the [Key Statistics Table](#).

Comerica Customer Sales Materials Now Available in Digital Format

In July 2017, our Corporate Marketing Team completed a digital transformation to convert our existing printed customer sales materials to digital versions. Our business relationship managers are now empowered to email Comerica materials to customers, making the sharing of product information seamless, interactive and instantaneous.

Marketing’s digital transformation encourages colleagues to use electronic delivery methods to deliver Comerica’s products and services to our customers over printed materials. As of April 2018, over 14,000 total users have accessed and shared Comerica’s new digital marketing materials, helping to contribute to further reductions in our paper consumption at Comerica and to our paper reduction goal.



2017 Paper Types	Recycled Content	FSC-Certified Paper
Office Copy Papers	96 percent of office copy paper contained at least 30 percent PCR content, same as in 2016	99 percent of office copy paper was FSC-certified, up from 98 percent in 2016

2017 Paper Types	Recycled Content	FSC-Certified Paper
Marketing Papers	95 percent of marketing paper contained at least 10 percent PCR content, up from 69 percent in 2016	99 percent of marketing papers were FSC-certified, down from 100 percent in 2016
Other Office Papers (rolled paper, statements, envelopes, business cards)	3 percent of other office papers contained at least 30 percent PCR content	3 percent of other office papers were FSC-certified

Our Retail Banking unit encourages our customers to save paper through initiatives like online statement delivery. We have created awareness through our website, posters in banking centers and direct marketing efforts. Through 2017, 20.7 percent of personal accounts and 31.1 percent of business accounts had elected to receive only online statements. Overall, nearly 16 percent of our just under one million customers have opted to discontinue receiving paper statements, similar to our 2016 numbers.

Waste

Comerica has maintained a national contract with a single waste disposal vendor since 2012. The national contract establishes a standard of practice for waste handling and provides the company valuable data from our portfolio of managed facilities on the type and schedule of material collection. Additionally, we track other recycled items (electronics, paper, cardboard, pallets and universal wastes) through our service vendors.

In 2014, we set a goal to reduce the amount of waste we send to landfills by 20 percent by 2020 over our 2012 baseline. Our waste reduction goal is focused on general office waste sent to the landfill (such as non-recyclable packaging and operational wastes that are collected in office trash cans). In 2014-2015, we expanded the waste optimization program to encompass retail locations in Michigan, Texas, Arizona and California where our corporate vendor has control over the pickup frequency. Our strategy is to continue auditing facilities to identify sites where we can reduce the size of the waste-to-landfill containers, reduce the frequency of landfill container collection and/or increase employee recycling programs.

Comerica's general waste streams are considered non-hazardous. Some of our capital projects involve demolition-generated asbestos-containing materials, which are handled in accordance with applicable regulatory guidelines.

Re-Purposing Office Furniture and Supplies During Renovations



Colleagues Christina DiAngelo Smith, Luz Nakano, and Katherine Tjader at one of the San Jose art sales benefiting Girls Inc. of Alameda County

To help reduce waste generated during large building renovations, we strive to reuse those office items that we can incorporate into the renovation. We look to sell and/or donate the office furniture, artwork and office supplies that we do not plan to use in the renovated workspace, allowing us to divert as much waste as possible from going to a landfill. In 2017, we had two CoWork office renovation projects in California, one of which included renovations at our San Jose, California Headquarters building.

During our San Jose CoWork renovation, Comerica's unused office items were donated to the Rocklin School District and Kids First of Placer County (office supplies), Placer County Search and Rescue (security-related items), and Goodwill Industries in Roseville (framed prints). The Comerica Women's Forum and Corporate Real Estate sponsored two sales of unused art that colleagues could purchase at the San Jose Headquarters, with all of the proceeds going to Girls Inc. of Alameda County, whose mission is "To inspire all girls to be strong, smart and bold." The art sales raised \$3,500 for Girls Inc. of Alameda County. The furniture that could not be reused in the new workspace, but still had value, was sold to local used furniture resale companies.

In 2017, the employee waste sent to the landfill increased by 149 tons, or 9.9 percent compared to 2016, largely due to extra waste pickups needed for office and banking center locations impacted by Comerica's RaCC and Gear Up programs. These programs, which were aimed at reducing operational expense and increasing building utilization and efficiency, resulted in the closure and relocation of some banking centers or office locations while other sites experienced reduced square footage of occupied or leased space.

In 2017, our recycled and repurposed waste decreased by 340 tons, or 13.2 percent. The percentage of waste diverted from landfills (58 percent) in 2017 was lower than 2016 (63 percent), since the waste diversion rate relies heavily on the amount of paper that we recycle through our secure paper destruction program (down 223 US tons from 2016). As we reduce the amount of paper that we consume faster than our overall waste streams, there is less paper waste to recycle, decreasing the waste diversion rate.

The electronic waste being recycled or repurposed through Comerica's IT equipment recycling/repurposing program also decreased 114 US tons compared to 2016. Comerica procures new IT equipment (laptops, computers, printers, etc.) with larger equipment refresh periods occurring every few years. 2017 saw a lesser amount of equipment refreshing so our recycled/repurposed quantities decreased.

Office waste recycling was up six US tons in 2017 as additional sites were included in the recycling programs. The increased office waste generated by the RaCC and Gear Up programs also decreased the waste diversion rate, adding more waste that needed to be disposed at a landfill for those waste streams that could not be reused or repurposed. Our total wastes (landfilled, recycled and repurposed) decreased by 12 tons, or 4.7 percent.

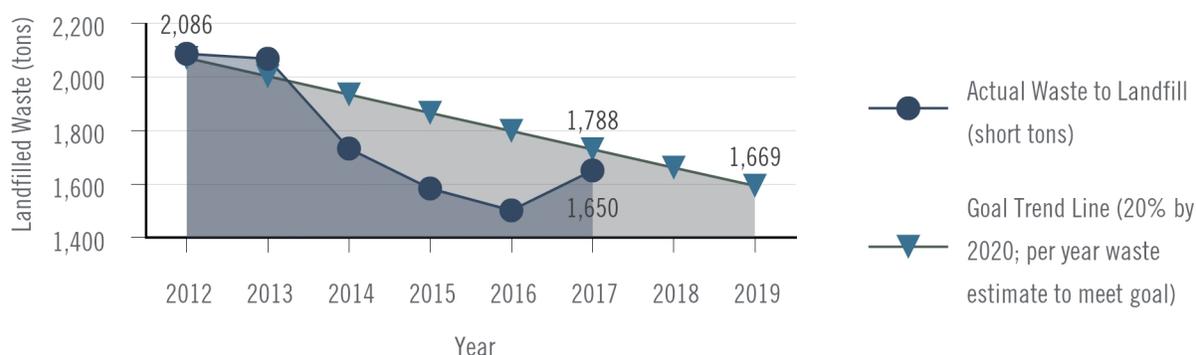
2017 Waste Diverted from Landfill



We met and exceeded our 2020 goal in 2015 (four years early). From 2012-2017, we reduced our waste to landfill by 436 tons, representing a 20.9 percent reduction (vs. our 20 percent goal).

For more details on Comerica's 2012-2017 waste generation by waste type, please see the [Key Statistics Table](#) within this report.

Progress Against Our 2020 Waste-to-Landfill Reduction Goal



The opportunities for further reducing total waste to landfill are shrinking. Our retail banking centers, which generate very little solid waste and were therefore easiest to optimize, were brought into the program in 2014. Also, adjusting waste container size or collection frequency without creating nuisance issues will be more difficult at the multi-tenant sites that generate larger amounts of waste and need more frequent collection schedules. Finally, our implementation of recycling at smaller locations is limited because of high costs and waste container siting requirements of municipal or development owners.

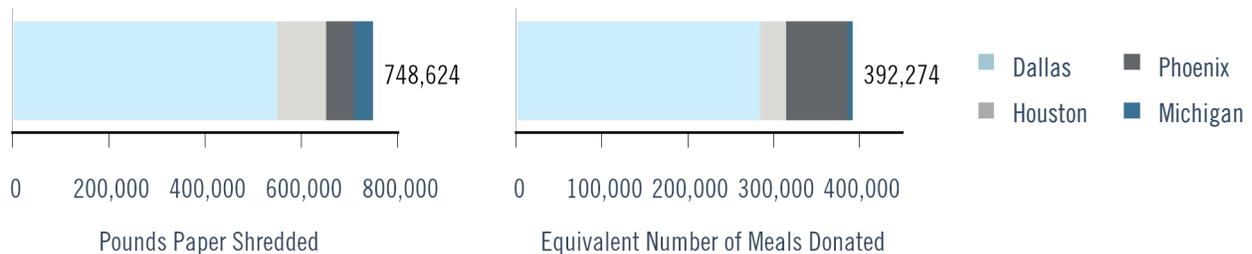
2017 Comerica Shred Days

Our most visible community event – Shred Day – held in Dallas/Fort Worth, Houston, Phoenix and Detroit in 2017, experienced a banner year with a record 862,087 pounds of paper recycled. The DFW event shattered its previous record, collecting more than 548,000 pounds of paper. Comerica partners with storage and information management services company Iron Mountain Incorporated® along with food banks from each of our host communities. The free events highlight the importance of fraud prevention and identity protection by collecting unlimited quantities of paper documents in our host communities. In the process, we raise awareness of the Comerica brand, help preserve the environment by freeing up space in local landfills and helped fight hunger in our communities with connected food drives. Since 2011, we have securely shredded approximately 3.5 million pounds of paper and organized the donation of the equivalent of 755,000 meals to local food banks. In 2017, we again partnered with Resource Partners to support electronic waste recycling in the Detroit event.



"U.S. consumers have lost more than \$107 billion to identity thieves in just the last six years, as identity theft remains one of the fastest growing U.S. crimes," said J. Downey Bridgwater, Comerica Bank's Houston Market President. "Yet, consumers can help protect themselves by securely destroying sensitive paper documents. Shredding is a safe, easy preventative step that helps ensure your personal information remains private." Comerica's Director of Corporate Sustainability, Scott Beckerman added, "Our Shred Day events are triple bottom line-focused on people, planet and protection by helping support those in need, recycle unneeded documents and prevent identify theft."

2017 Comerica Shred Day Metrics



Water Stewardship

Water Stewardship is a priority for Comerica, particularly in light of our geographic footprint with locations in both water-abundant and water-stressed regions. Our management approach continues to focus on using water more efficiently across our building portfolio and monitoring our water consumption and costs.

We have modified our irrigation system watering schedules in California to comply with local utility requirements and continue to inspect these systems to confirm water is not being wasted. To assist in using water more efficiently, we also incorporated Weathermatic

irrigation controls systems, starting at five sites in Texas in 2014. Over the last three years, we have expanded the use of these systems to 28 sites in Texas, Arizona, California and Michigan. The Weathermatic smart irrigation controls project sites reduced their water use in 2017 by over 2 million gallons. We continue to evaluate our properties for smart irrigation technology or conversion to low-water or drought-tolerant landscaping and have added language to our regional landscaping contracts to further promote regular inspections of irrigation systems and site-tailored watering schedules based on plant needs, soil type and topography. Our Facilities Management Team has also been trained on how to monitor for water leak or water waste situations at their managed facilities.

Comerica's drinking water is sourced through local water utilities. A few Comerica-owned locations in Michigan are also equipped with on-site wells that provide water for landscape irrigation purposes. We have committed to reducing water consumption at Comerica utility metered locations by 30 percent by 2020 over a 2012 baseline. The total square footage of sites with metered water for 2017 was three million square feet, which represents 68 percent of our total occupied square footage (average four quarters).

The utility-supplied water consumption totaled 86.8 million gallons, a decrease of 7.3 million gallons (or 7.8 percent) versus 2016. The Michigan region (down 3.5 million gallons or 6.4 percent) and Texas region (down 5.7 million gallons or 18.9 percent) led the way in terms of greatest volume of reductions, primarily due to efficiency measures like the Weathermatic smart irrigation controls that were installed at a large office campus in Michigan mid-summer 2017. Some of these reductions were offset by increases in California (1.6 million gallons or 50.4 percent vs. 2016) and Arizona (0.6 million gallons or 14.9 percent vs. 2016) related to the slight easing of previous drought restrictions, increased irrigation for several locations with landscaping improvements, and a leak on the main line to one of our California locations, which has since been repaired.

Progress Against Our 2020 Water Goal



As of year-end 2017, we have reduced our metered water consumption by 32.5 million gallons of water, representing a 27.3 percent decrease over our 2012 water consumption. The water reductions that we have seen over previous years have been related to the operation of smart irrigation control systems, increased attention to irrigation system programming and maintenance and compliance with local utility water use restrictions. We are within 2.7 percent of meeting our 30 percent reduction goal by 2020.

For historic details on Comerica's 2012-2017 water consumption data, please refer to the [Key Statistics Table](#) in this report.

External Environmental Impacts

Comerica's external environmental impacts include green lending, those risks and opportunities related to customer real estate collateral used to secure loans and our supply chain products and services.

Green Lending

Recognizing our sustainability influence goes beyond our own footprint, one of the more impactful things we do as a provider of financial services, is to support those businesses that are supporting a greening economy. By working with companies involved in environmentally beneficial industries and projects, we are able to extend sustainability to our customers.

Comerica Tracked Green Loan Codes		
Bio-Fuels	Bio-Gas	Brownfield Redevelopment
Energy Efficiency	Geothermal, Wave or Tidal Energy	Green Building (New or Retrofit)
Green Engineering, Consultation, Evaluation, and Design Services	Other Green Products and Services	Pollution Control
Recycling	Smart Grid Technologies	Solar Energy
Vehicle Electrification, Advanced Battery and Fuel Cell		Wind Energy

Since 2012, Comerica has tracked our green loans within our loan systems. We do this using a list of 14 environmentally beneficial (or green) loan categories to code loans and commitments to green companies and projects. We include both inherently green companies and projects, as well as loans where the majority of the funding is being used to achieve an environmentally beneficial purpose. We have intentionally set a high bar with respect to green loan coding to ensure we are not "greenwashing" by overstating our results in this area.

"As we continue to look for growth areas in our business, the greening economy presents a unique set of risks and opportunities to explore as we support businesses which are excelling in this area of the economy."

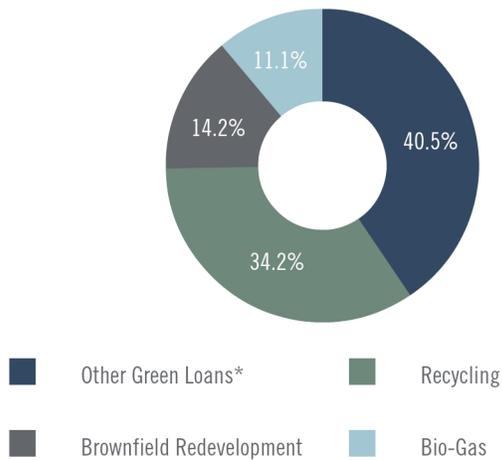
Pete Guilfoile, Executive Vice President and Chief Credit Officer

At year end 2017, our environmentally beneficial loans and commitments totaled over \$832 million to 78 customers, compared to \$888 million to 95 customers at the end of 2016, a reduction of six percent. In 2017, we saw the largest increases by dollar amount in green lending within our "Recycling" loan code (45 percent increase) and the "Bio-Gas" loan code (112 percent increase) while the largest decreases by dollar amount were seen in the "Brownfield Redevelopment" loan code (45 percent decrease) and the "Green Building" loan code (68 percent decrease).

We provide instructions and resources to help colleagues accurately code green loans in Comerica's loan systems. On a quarterly basis, we share the green loan data by dollar amount and customer count with Comerica's Sustainability Council. Comerica's Sustainability Office also continues to work with our lending and credit groups to discuss opportunities to provide loans to green sectors that also meet Comerica's credit requirements.

As Comerica invests in technologies to enhance our customers experience, increase efficiency and bolster risk management, we've implemented new systems to support our business operations, as described further in our [2017 Annual Report](#). Given these operational and systems-based changes, our Sustainability Office did not provide direct training on green loan coding to loan and credit groups in 2017. This lack of training and reminders to code green loans may be part of the reason we saw a further decline in our green loan coded numbers for 2017. Moving forward, we plan to provide additional training resources and evaluate the best approach to enhancing our green loan tracking capabilities in 2018.

*Environmentally beneficial loans and commitments by loan code category
(% of total environmentally beneficial loan commitments by dollar amount)*



* Data as of 12/31/17. The *Other Green Loans* category in this chart includes the following environmentally beneficial loan codes (each represents less than 8 percent of Comerica's total environmentally beneficial loans and commitments):

- Green products and services that do not have their own loan code (7.8%)
- Wind Energy (7.5%)
- Green Eng/Consult/Eval/Design (6.8%)
- Green Building (5.0%)
- Pollution Control (4.6%)
- Solar Energy (4.2%)
- Vehicle Electrification/Adv. Battery/Fuel Cell (2.4%)
- Energy Efficiency (1.3%)
- Bio-Fuels (0.7%)
- Smart Grid Technologies (0.3%)

Elevating the Experience and Raising Expectations

When our customer's approach to business aligns with the culture at Comerica, synergies abound and goals are accomplished. This is the case with our valued customer, RiverRoad Waste Solutions, Inc. This innovative, women-owned business implements industry-leading waste and recycling solutions that provide transformational results. Their goal is clear: Elevate the Experience of their clients by building long-lasting relationships and continuously exceeding their strategic sustainability goals. At Comerica, we strive to raise the expectations of what a bank can be.

RiverRoad's industry-leading technology, myRoad™ 3.0, provides advanced analytics and critical business intelligence that enables their clients to make informed business decisions. Having 24/7 transparent access to critical waste and recycling program metrics leads to innovative sustainability solutions, saving their clients time and money. RiverRoad's technology along with a team of industry experts provides their clients with waste and recycling programs that regularly exceed sustainability goals.



“We value our relationship with Comerica because their team shares our vision of creating sustainable value for our clients. Working together, RiverRoad’s team of experts is able to deliver waste and recycling solutions that are efficient, economical, innovative, and compliant.”

Kristen Bunnell, RiverRoad Waste Solutions CEO



Developing Sustainable Ingredients - Darling Ingredients Inc.

As population growth continues to rise, so does the demand for food, feed and fuel. Traditional resources such as water, fauna and fossil fuels are depleting, which increases the demand for sustainable ingredients. This requires that our world find ways to significantly increase the production of food, feed and energy with limited impact on the environment in order to continue to meet basic human needs. That's where Darling comes in.



Darling Ingredients collects the meat by-products from our animal-based diets, and processes them to reclaim valuable and essential bio-nutrients, fats, oils, proteins, meals and more that are used daily in personal, commercial, and industrial products. These natural and sustainable ingredients are marketed internationally to the pharmaceutical, food, animal feed, pet food, biofuel, fertilizer, sports nutrition and cosmetic industries. Their gelatin (they are the world's leader in gelatin production) helps make marshmallows fluffy, vitamins easier to swallow, and gummy bears gummy. Recovered proteins and fats add nutritional, flavor and digestibility benefits to animal feed and pet foods, and their organic fertilizer is used on golf courses, in nurseries and greenhouses, and sports arenas across the U.S. The oil used to fry your fries at lunch could be converted into biofuel at one of Darling's 3 facilities in North America (Darling was the first in both the U.S. and Canada to use animal fats and used cooking oils to produce biodiesel on a commercial level). It is safe to say a day doesn't go by that our lives aren't touched by Darling in some way.

CREATING
SUSTAINABLE
FOOD, FEED AND
FUEL INGREDIENTS
FOR A GROWING
POPULATION

Founded in 1882 to deal with the inedible remnants of Chicago's thriving meat processing industry, giving nature a second life has become second nature for Darling. "We are committed to sustaining clean air and water, providing for safe food and feed, supporting our communities and securing our workplaces. We attain this through our employees' dedication to our core values - entrepreneurship, integrity and transparency. We seek better ways to improve the world and provide for its growing needs. Not just today, but as an ongoing philosophy." Says Randall Stuewe, Chief Executive Officer for Darling. "As our financial partner, Comerica further demonstrates their commitment to sustainability helping differentiate them in the marketplace."



"For us, respect for the environment and a commitment to the development of sustainable natural ingredients are the foundation on which our company is built. In true entrepreneurial fashion, we continuously look for new and better ways to optimize the food safety - for both people and animals - minimize our environmental impact, and be a good neighbor for the communities we operate in. All while creating value for our shareholders. Comerica understands and supports our work in this regard and we appreciate the sense of shared values among our companies."

Randall C. Stuewe, Chief Executive Officer, Darling Ingredients Inc.

Environmental Risk Management

Risk management has always been a priority at Comerica and is more important than ever, given the pace of change in the business world, the economy, the rapidly evolving regulatory expectations and the highly competitive business environment. Our consistent and conservative approach to banking has fostered a robust risk culture at Comerica. This makes us strong and resilient, benefiting our stakeholders and our business. Our approach is not to eliminate risk, but to understand, manage and receive the appropriate consideration for the risks we elect to accept. In this way, we appropriately balance revenue targets with our corporate strategy, mission and Core Values.

Environmental risk is an increasingly relevant and high profile issue for the private sector. For Comerica, such risk includes both the environmental impact associated with our own operations and those of our customers. Comerica's Environmental Risk Management (ERM) Group, within our Enterprise Risk Department (ERD), manages 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. Risks associated with the impacts of our operations are managed through the Corporate Sustainability Office in close partnership with Corporate Real Estate, Procurement and other internal business units. Read more about this in [Managing Environmental Impacts of our Operations](#).

Managing environmental risk limits the economic, regulatory and reputational risks associated with taking real estate as collateral in a loan transaction. Comerica follows the Federal Reserve System and Federal Deposit Insurance Corporation guidelines that require lending institutions to have policies and procedures in place to manage environmental risk. We have long maintained policies and procedures for managing the environmental credit risks related to our loans in addition to the environmental risks and compliance obligations associated with the properties we operate.

We expect compliance with environmental laws that are covered in our lending agreements. We 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 make agreements that establish specific outcomes and deadlines.

Our Environmental Liability Policy requires properties that are pledged as collateral to be evaluated for potential significant environmental liabilities using standard and proprietary due diligence tools. Throughout this process, our loan officers work with customers and seek guidance, as needed, from Comerica's ERM Group. The policy applies to real estate-secured loans (excluding one-to-four family residential properties), and requires environmental due diligence under the following circumstances:

- When we finance a new loan,
- When we consider taking title to a property due to a loan default, and
- When we refinance an existing loan under a range of circumstances, including when the loan amount is increasing and a property has a high potential environmental risk.

Most property loan-related environmental due diligence reports are referred to the ERM Group for expert review. In 2017, the team evaluated approximately 1,000 sites associated with loans totaling approximately \$6.75 billion. These reviews were undertaken for 237 different loan officers for properties located in forty different states. Nearly 60 percent of the loans the ERM Group reviewed were for commercial and industrial-type properties, which are more likely to have environmental risks.

ERM Group members collaborate with our legal and environmental consulting partners on best practices for managing current and emerging environmental risk issues. They also took leadership or board positions in environmental organizations, including:



In 2017, ERM took several steps to further strengthen risk management. These included:

- Revising the credit policy, consistent with the bank's initiatives, to better define circumstances that require environmental due diligence,
- Spear-headed and authored an industry document for changes to the Small Business Administration's (SBA's) Standard Operating Procedure for conducting environmental due diligence at properties at the request of Comerica's SBA Department, and
- Organized the Southern California Environmental Risk Managers Roundtable for Comerica's and other banks' environmental risk managers, which was hosted at Comerica's Costa Mesa, California office.

The team also provided ongoing training for relationship managers and credit staff, and worked with Comerica's Corporate Learning team to design an online training module to streamline and train relationship managers and loan closing specialists regarding the new credit streamlining process. This online training module is anticipated to be available to employees in 2018.

Supporting Brownfield Transformations

Comerica has long been a lender to brownfield redevelopment projects. Our veteran team of environmental risk managers and Comerica's expertise in this type of lending allows us to support our customers and in turn help safely redevelop our communities. Examples of projects assessed in 2017 include:

- Urban redevelopment of formerly contaminated parcels assembled for large scale residential and mixed-use development
- Cleanup and redevelopment of former oil fields for construction of multiple commercial and industrial buildings
- Assessment for redevelopment of a former large-scale food processing plant
- Refurbishment of a former asbestos building products plant for industrial reuse
- Redevelopment of a former hospital with areas of remaining subsurface impact
- Conversion of former shipyard parcels for residential redevelopment

“We deploy a team of environmental scientists with broad backgrounds and deep experience to properly assess the environmental status of a property. Comerica’s careful and insightful evaluation allows us to move forward with transactions while protecting our risks, the borrower’s risks and the health and safety of the future site occupants.”

Richard Belyea, Vice President and ERM Group Manager

Reducing Environmental Impacts in our Supply Chain

In our [Environmental Policy Statement](#), we commit to giving preference, where appropriate, to suppliers who demonstrate superior environmental performance. We use an Environmentally Preferred Purchasing program (EPP) to reduce our impacts in our own operations, and we encourage our supply base to do the same.

Supply Chain Overview

At Comerica, we strive to understand our supply chain and appropriately manage the risks and opportunities it presents. We also endeavor to extend our positive impacts on the environment and communities by promoting a sustainable supply chain. We consider both supplier diversity and the sustainability practices of suppliers during our rigorous, 7-step sourcing process for selecting and evaluating suppliers. In our own operations, our Green Procurement Work Group looks to source suppliers and services that meet our environmental criteria where possible.

Comerica has approximately 4,500 suppliers and an annual supplier spend of roughly \$590 million dollars, with about 48 percent of our spend with our top 100 suppliers. Nearly 50 percent of our supply base (by number of suppliers) and 32 percent of the total spend is located in two key markets, Texas and Michigan. We use approximately 1,200 suppliers in Michigan and 900 suppliers in Texas. Our supplier spend falls into the following key categories: technology, telecommunications, information security, facilities and real estate, marketing, human resources, legal, and other banking and financial services-related products and services.

Comerica primarily does business in the United States and has no significant presence or investment in countries where lack of human rights protection is a known problem. Accordingly, we do not currently screen suppliers or investments specifically for human rights issues.

Environmental Screening of Suppliers

We have grouped our suppliers into five groups for scoring. We began scoring suppliers in 2011, with Round 1 scoring (Groups 1 through 5) conducted from 2011 to mid-2014, and Round 2 scoring (Groups 1 through 5) conducted from mid-2014 through 2017. Our goal is to monitor improvements in performance, and to increase our spend with suppliers that fall within the acceptable sustainability scoring range of A, B, or C by 5 percent each scoring round. After the first round of scoring, the Green Procurement

Group Lead and the Corporate Sustainability team conducted performance reviews with the suppliers that fell short of an acceptable sustainability score and suggested potential improvements.

We use a 40-question Environmental Sustainability Questionnaire to collect information about the policies and performance of our existing suppliers. We focus on our largest suppliers (which generally comprise the suppliers in the previous year's top 30 percent of spend) and those providing significant amounts of manufactured goods. Beyond the top 30 percent of spend, the number of suppliers increases considerably and therefore limits our availability to provide meaningful engagement on environmental sustainability.

Supplier Sustainability Scoring			
35%	14%	7%	9%
Percent of spend screened every three years for environmental sustainability as of 2017 (includes 34 suppliers)	Increase in spend dollars with suppliers with a score of A through C*	Increase in average score of Group 1-5 suppliers Round 2 vs. Round 1*	Decrease in average score of Group 1 suppliers Round 3 vs. Round 2** primarily due to one vendor with a significantly decreased score

* Metrics based on comparison of Round 1 to Round 2 (Groups 1-5) as of YE 2016.

** Metrics based on comparison of Round 3 to Round 2 (Group 1) as of YE 2017. Round 3 of Group 2- Group 4 suppliers are anticipated to be scored on sustainability in 2018 and Round 3 of Group 5 suppliers are anticipated to be scored in 2020 (scored every 3 years).

In April 2017, we changed the process by which we engage with our suppliers during the goods and services sourcing process. Our Sustainability Office now participates in our Corporate Purchasing sourcing initiative review meetings. This allows the Sustainability Office to review purchasing projects early in the process and to determine which projects will need to be scored for sustainability based on potential project environmental impacts. This process improvement broadens the opportunity to assess new sourcing projects for sustainability rather than reviewing Request for Proposals (RFPs) exclusively. If we determine that RFP scoring is required for a specific sourcing project, then we ask suppliers to respond to questions about the sustainability impacts of the services that they will be offering and potential information about the sustainability of their operations. When RFP sustainability scoring is deemed appropriate, the Sustainability section of the RFP accounts for 5 percent of the overall RFP score.

While we review real estate-related projects for potential sustainability impacts, we do not score those projects for sustainability given the significant number of small real estate projects and suppliers. Instead, sustainability-related criteria are embedded in the larger real estate projects, and when feasible, sustainable product attributes are incorporated into real estate RFPs. Additionally, our Corporate Real Estate Department asks our key real estate suppliers to discuss their sustainability progress during regularly scheduled business reviews to help drive performance and that progress is shared with the real estate sustainability working group on a monthly basis.

For additional details on our Supply Chain sustainability progress, please refer to our most recent [CDP Response](#).

Environmentally Responsible Procurement

Buying environmentally preferable products helps reduce our operations' impact on natural resources. Our Green Procurement Work Group oversees our EPP program, which covers common purchases ranging from furniture and carpeting to computer equipment and office supplies. The Work Group includes members of our Corporate Purchasing, Marketing and Sustainability departments as well as key supplier partners. Our Work Group provides colleagues with best practices related to EPP and purchasing managers with tools to help increase the purchase of environmentally preferred products where possible.

Where feasible, we try to incorporate environmental attributes into our key products purchased. We work with several key suppliers to quantify the annual environmental impacts of our purchases, including the following focus areas:

- Recycled content and NSF 140 rating of the carpet products,
- Quantity of computer purchases that meet the IEEE Electronic Product Environmental Assessment Tool (EPEAT) ratings (considering the entire lifecycle of the computer),

- Quantity of furniture purchases that received the Business and Institutional Furniture Sustainability Standard (BIFMA) level® certification (considering materials used, energy and climate impact, human and ecosystem impacts, and social responsibility), and
- Recycled content of office supplies purchased, including office copy paper. (For more details on paper performance, see [Material Consumption](#).)

2017 EPP Performance				
Carpeting	Computers	Furniture ¹	Office Supplies ¹	
100% of 2017 carpet purchases contained recycled content and was at least Gold NSF 140 certified	100% of computers and displays purchased carried the EPEAT Gold rating in 2017	76% of furniture purchases in 2017 were BIFMA level® certified	17% of office supplies purchased from Office Depot in 2017 contained post-consumer recycled content (primarily related to paper purchases)	41% of office supplies purchased from Office Depot in 2017 were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System

1: These suppliers represent a high percentage of purchases in these categories

Employee Sustainability Engagement

Comerica operates in a dynamic and competitive industry, which makes successful collaboration with colleagues critical to success. Open lines of communication between colleagues and leaders are an integral part of our over 165-plus year culture. We believe strongly that this direct relationship underpins our success in maintaining a great work environment, one that is collaborative and in which colleagues are treated with dignity and respect. We also know that some employees are inspired to work for purpose-driven organizations with which they share values. We find employee involvement to be a powerful driver of engagement as colleagues become active participants in our diversity and environmental sustainability efforts, and in supporting our communities through volunteerism.

Engaging Employees on Environmental Sustainability

From making green loans to recycling office supplies, a way that we engage employees is by harnessing their enthusiasm and commitment to drive our environmental sustainability efforts. We engage and educate colleagues on sustainability through corporate intranet communications and discussion boards, green office teams, sustainability-focused work groups and training. New employees are required to complete mandatory sustainability awareness training, with 98 percent of Comerica's 2017 new hires completing the course.

A cornerstone of our engagement on sustainability is Comerica's Master of Sustainability Awareness (MSA) program, which was made available to all of our colleagues in 2017. This internal certification program is built on four pillars: Education, Communication, Engagement and Advocacy. Our MSA program uses the metaphor of a growing tree. Our colleagues start at the Seedling level, where the focus is on education, then progress to the Sapling level, where the focus lies on balancing the four dimensions, and finish at the Mighty Oak level, where the focus is on advocacy — the 'doing' part of sustainability. The MSA process is designed to move Comerica colleagues from learning about sustainability, to sharing what they have learned, and finally putting it into action by engaging in activities that both support Comerica as a more sustainable organization and bring sustainability to colleagues' personal lives. By year-end 2017, we had 318 Comerica colleagues enrolled in the MSA Program with 38 MSA Seedling-level, seven Sapling-level, and two Mighty Oak-level certified colleagues.



"I started working on my MSA Seeding certification in 2017 and my eyes have been opened to the grave importance of making the world more sustainable. I am so pleased to work for a company that is educating ME on how to be a better human being and save our earth and I can't wait to spread the word!"

Angela Boyd, Human Resources

We also offered our colleagues the opportunity to participate in Northwest Earth Institute's EcoChallenge in October 2017. The EcoChallenge is set up to help people change habits by sticking to environmental and health commitments for two weeks. This challenge engaged our Comerica team by comparing our team's progress to other participating companies. We had over 40 employees participate in the challenge and our EcoChallenge team placed 52nd out of 639 teams based on the environmental actions taken at work and at home by our colleagues.

Eleven active green office teams, made up of dedicated volunteers based at our larger office buildings, organize year-round sustainability awareness and community involvement initiatives. In 2017, our teams coordinated and participated in 29 office and community-based events, including environmental volunteering projects, employee contests, children's art contests, clothing exchanges, nonprofit item donations, lunch and learn educational events, and coordination of local employee personal document shred days.

2017 Green Office Team Activity Examples



Rethinking Holiday Gift Wrapping

Why do we want to Rethink Holiday Gift Wrapping?

- Wrapping paper and shopping bags account for 4 million tons of trash in the U.S. annually
- 42.5 million of paper products consumed in the U.S. yearly goes toward packaging/wrapping and decorating goods

Engaging Employees through Diversity and Volunteerism

Please review the [Our Workforce](#) and [Our Community/ Employee Involvement](#) discussions within the Diversity and Inclusion section of this report for more details on how we engage our employees on the topics of diversity and volunteerism, respectively.

Key 2018 Sustainability Priorities

Developed by Comerica’s Sustainability Council and officially adopted by the Enterprise Risk Committee of the Comerica Incorporated Board of Directors, our 2018 Sustainability Action Plan is comprised of 30 interlinking projects and initiatives that are intended to advance our progress as we build additional sustainable value.

Our 2018 Sustainability Priorities: Raising expectations using sustainable value creation:

- 1 Support the use of sustainability in products, services and relationships
- 2 Set new environmental goals to further drive reductions in our footprint
- 3 Consult with stakeholders to understand their sustainability and engagement priorities
- 4 Leverage MSA for colleague attraction, retention and engagement; enhance collaboration with other areas at Comerica on corporate responsibility
- 5 Monitor emerging sustainability risks; evaluate evolving frameworks for environmental and social risks; protect our image and enhance our brand

We have worked hard to establish the systems and processes to manage our own footprint and look to make additional gains in supporting our customers and communities through our relationship banking approach. As such we are committed to maintaining our focus on expanding sustainable value creation through advancing knowledge and innovation, opportunities and revenues, cost and risk reduction, and reputation and brand.



“Our focus on sustainability supports our role as a responsible company. From establishing new goals for further reducing our environmental footprint, to continually improving our sustainability disclosures for investors and analysts, we are committed to maintaining sustainability as a priority for Comerica.”

Muneera Carr
Executive Vice President and Chief Financial Officer
Executive Sponsor of Comerica’s Sustainability Program

ADDITIONAL INFORMATION

Key Statistics Table

Italicized numbers indicate minor revisions to previously reported numbers. See footnotes for additional information on calculation methodologies and explanations of revisions.

KEY STATISTICS	2012	2013	2014	2015	2016	2017
ECONOMIC IMPACTS						
Gross revenue (Millions \$) ¹	<i>2,598</i>	<i>2,554</i>	<i>2,512</i>	<i>2,724</i>	2,848	3,168
Market capitalization at year end (Millions \$) ²	5,712	8,667	8,385	7,350	11,941	15,006
Common and preferred stock dividends (Millions \$)	106	126	143	148	154	193
Taxes (Millions \$)	98	283	165	318	254	258
Employee compensation and benefits (Millions \$)	1,018	1,009	980	1,009	961	912
Goods and services purchased (Millions \$) ¹	724	695	<i>617</i>	<i>800</i>	959	955
Total loans at year end (Millions \$)	46,057	45,470	48,593	49,084	49,088	49,173
SOCIAL IMPACTS						
Market Presence						
Number of ATMs	640	635	639	637	606	589
Number of U.S. banking centers	488	482	480	476	457	437
Community Development						
Community and economic development loans (Millions \$)	174	512	354	342	380	439
Low-income housing tax credit investment deals closed (Millions \$)	69	74	74	78	75	75
Historic rehabilitation tax credit investment (Millions \$)	1.2	6.5	0	2	0	0
Percentage of projects that benefited from Comerica's tax credit investments that were LEED-certified housing projects (Percent)	N/A	N/A	10	7	6	6
Number of micro-enterprise loan funds supported	29	25	29	27	29	29
Supplier diversity spend (Millions \$) ³	70	70	67	110	102	64
ENVIRONMENTALLY BENEFICIAL LENDING						
Environmentally-Beneficial Loans						
Loan commitments (Millions \$)	1,043	780	975	919	888	832
Loan commitments (number of companies)	127	101	105	116	95	78

KEY STATISTICS	2012	2013	2014	2015	2016	2017
ENVIRONMENT-OPERATIONS						
Energy Use (MWh)						
Total direct and indirect energy use- real estate and transport	153,210	149,742	146,939	143,394	130,304	122,319
Total direct and indirect energy use- real estate only ⁴	148,266	144,783	143,015	139,405	126,715	118,641
Direct energy use- fossil fuels	30,966	38,939	42,891	33,672	28,725	27,509
Indirect energy use- purchased electricity, steam, chilled water in metered buildings	93,779	85,505	80,163	77,514	71,993	67,222
Indirect energy use- estimated electricity use in leased (and unmetered) buildings	28,465	25,298	23,885	28,219	25,997	19,277
Energy Intensity						
Total direct and indirect energy use- real estate ⁴ (MWh) per square foot at year end	0.0267	0.0267	0.0267	0.0269	0.0255	0.0250
Total direct and indirect energy use- real estate ⁴ (MWh) per square foot - average square feet over four quarters	N/A	0.0265	0.0265	0.0263	0.0250	0.0243
Total direct and indirect energy use (MWh) per full time employee (FTE)	N/A	N/A	N/A	16.21	16.53	15.32
Scopes 1 and 2 GHG Emissions (Metric tons of CO ₂ e)- Real Estate and Transport ⁵						
Total GHG Emissions from Real Estate (Scopes 1 and 2) and Travel (Scope 1)	81,735	75,839	73,200	68,603	63,332	58,121
Breakdown by Activity						
GHG emissions- Scopes 1 and 2 real estate only	80,533	74,635	72,247	67,636	62,461	57,229
Emissions intensity- real estate (metric tons of CO ₂ e per square foot at year end) within organization	0.0145	0.0138	0.0135	0.0131	0.0126	0.0120
Emissions intensity- real estate (metric tons of CO ₂ e per square foot- average square feet over four quarters) within organization	N/A	0.0137	0.0134	0.0128	0.0123	0.0117
Percent Cumulative reduction from 2012 base year (Goal= 20 percent GHG reduction from base year by 2020)	N/A	7.2	10.3	16.0	22.4	28.9
GHG emissions- Scope 1 transport only	1,201	1,204	953	967	870	892
Breakdown by Scope						
Scope 1 GHG emissions- natural gas, jet fuel, diesel, gasoline, and refrigerants	6,950	8,019	8,523	7,638	6,608	6,492
Scope 2 GHG emissions- electricity, steam, and chilled water in company-controlled buildings	74,784	67,820	64,677	60,965	56,723	51,629

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Scope 3 GHG Emissions (Metric tons of CO ₂ e)- Supply Chain and Transport ⁵						
Purchased Goods and Services						
Total lifecycle paper emissions	3,055	2,873	2,511	2,152	1,797	1,706
Life cycle emissions associated with office copy paper use	1,270	1,136	1,030	933	836	680
Life cycle emissions associated with other office paper use	1,563	1,558	1,262	1,050	811	936
Life cycle emissions associated with marketing paper use	222	178	219	170	151	91
Total lifecycle computer emissions	520	57	202	193	1,389	1,317
Total lifecycle carpeting emissions	137	168	125	287	271	541
Capital Goods						
Total lifecycle furniture emissions	N/A	463	148	425	303	268
Fuel-and-energy related activities						
Electricity transmission/distribution loss emissions	N/A	4,442	4,302	5,441	5,095	2,671
Upstream Transportation and Distribution						
Shipping emissions ⁶	N/A	572	404	234	196	113
Armored vehicle emissions	N/A	967	635	640	981	613
Waste Generated in Operations						
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	2,033	914	765	521	573
Business Travel						
Employee business travel by air and car	4,431	4,791	4,147	4,174	3,426	3,431
Emissions intensity- Employee business travel emissions (metric tons of CO ₂ e) per full-time employee (FTE)	N/A	N/A	N/A	0.47	0.43	0.43
Employee Commuting						
Employee commuting emissions	N/A	35,864	33,200	33,061	29,327	29,278
Downstream Leased Assets						
<i>Total subleased real estate emissions</i>	1,257	1,508	2,141	1,934	1,606	1,470
Subleased metered electricity	726	665	629	484	371	321
Subleased estimated electricity	423	715	1,107	1,120	976	1,022
Subleased natural gas	81	106	108	76	37	23
Subleased steam	28	22	25	8	—	—
Subleased estimated heat-natural gas	N/A	N/A	N/A	N/A	5	5
Subleased corporate jet emissions	N/A	N/A	272	246	217	100
Other Downstream						
CBRE Business Travel on Comerica Account	N/A	N/A	N/A	253	278	203

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Real Estate Square Footage (Square feet at year end)						
Total metered and unmetered square feet at year end	5,545,466	5,422,833	5,349,936	5,183,634	4,963,357	4,749,329
Total subleased square feet at year end	137,637	197,753	188,292	173,886	159,968	156,882
Real Estate Square Footage (Average square feet over four quarters)						
Average metered and unmetered square feet over four quarters	N/A	5,464,632	5,398,441	5,291,828	5,064,895	4,880,994
Average subleased square feet over four quarters	N/A	159,866	193,282	181,384	163,331	156,611
Waste Management (short tons)						
Landfilled employee waste	2,086	2,067	1,732	1,583	1,501	1,650
Percent Cumulative reduction from 2012 base year (Goal= 20 percent Landfilled Waste Reduction by 2020)	N/A	N/A	16.9	24.1	28.0	20.9
Total recycled/re-purposed waste	3,372	2,990	2,915	2,917	2,584	2,244
Recycled office paper	3,108	2,680	2,684	2,676	2,248	2,025
Recycled electronic equipment	94	117	52	51	107	27
Repurposed electronic equipment	55	46	15	26	43	9
Recycled operational waste	110	141	154	153	166	166
Recycled cardboard bailer waste	N/A	N/A	7	7	8	8
Universal waste	3	5	3	4	8	4
Recycled pallets	N/A	N/A	N/A	N/A	5	5.8
Total waste diverted from landfill (Percent) including recycled office paper, recycled/repurposed electronic equipment, recycled employee waste, and universal waste	62	59	63	65	63	58
Water Use (cubic meters) ⁷						
Total water consumption (cubic meters)	451,532	412,123	349,785	339,438	356,216	328,398
Intensity metric- Water consumption (cubic meters per Total Employee FTE)	N/A	N/A	N/A	38.37	45.18	41.14
Intensity metric- Water consumption (cubic meters per Total Worker FTE)	N/A	N/A	N/A	35.04	40.76	37.19
Percent Cumulative reduction from 2012 base year (Goal= 30 percent Water Reduction by 2020)	N/A	N/A	22.5	24.8	21.1	27.3
Paper Use						
Total paper consumption (tons)	1,266	1,173	1,039	894	750	707
Office copy paper consumption (tons)	560	487	454	410	368	299
Other office paper consumption (tons)	618	615	499	416	323	371
Marketing paper consumption (tons)	88	71	87	68	60	36

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Paper Intensity metrics (pounds consumed per FTE)						
Total office paper (office copy and other office paper) consumption in pounds per FTE	N/A	N/A	N/A	186.73	175.18	167.97
Office copy paper consumption in pounds per FTE (tons)	N/A	N/A	N/A	92.69	93.34	74.99
Percent Cumulative reduction from 2012 base year (Goal= 50 percent Office Copy Paper Reduction by 2020)	N/A	N/A	18.9	26.7	34.3	46.6
<i>Environmental Attributes of Paper</i>						
Total FSC-certified office paper (Percent of total)	47	28	48	49	54	46
Total FSC-certified marketing paper (Percent of total)	64	90	80	99	100	99
Office copy paper with at least 30 percent post-consumer recycled content (Percent of total office copy paper)	97	74	96	95	95	96
All other papers (excluding office copy paper) with at least 5 percent post-consumer recycled content (Percent of total papers except office copy paper)	14	12	14	25	37	36
Total post-consumer recycled content by weight (Percent of total paper consumption)	14	13	10	15	16	14
EMPLOYEES						
Number of Workers						
Total Employees- Full-time equivalents (FTE) ⁸	9,035	8,948	8,876	8,880	7,960	7,999
Intensity-based FTEs - used for intensity-based metrics ⁹	N/A	N/A	N/A	8,847	7,884	7,983
Total Workers (including employees and contingent workers, on FTE basis) ⁹	N/A	N/A	N/A	9,687	8,740	8,831
Employee Diversity						
Women employees (Percent of total employees)	N/A	N/A	N/A	67.1	67.3	66.5
Women Officials and Managers (total number) ¹⁰	N/A	N/A	N/A	1,251	728	725
Women Professionals (total number) ¹⁰	N/A	N/A	N/A	1,498	1,415	1,497
Women Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰	N/A	N/A	N/A	3,341	3,298	3,198
Racial/Ethnic Minority Population employees (Percent of total employees)	N/A	N/A	N/A	38.5	38.2	39.1
Racial/Ethnic Minority Officials and Managers (total number) ¹⁰	N/A	N/A	N/A	662	328	343
Racial/Ethnic Minority Professionals (total number) ¹⁰	N/A	N/A	N/A	834	780	840
Racial/Ethnic Minority Other (Administrative Support, Sales Worker, and Service Worker) (total number) ¹⁰	N/A	N/A	N/A	1,996	1,979	2,007

KEY STATISTICS	2012	2013	2014	2015	2016	2017
Colleagues enrolled in Comerica's Master of Diversity Awareness (MDA) Program(Percent) ¹¹	N/A	N/A	85	80	89	88
Bronze-level certified colleagues (number of colleagues)	N/A	N/A	5,028	5,345	5,167	5,301
Silver-level certified colleagues (number of colleagues)	N/A	N/A	3,536	4,081	3,984	4,180
Gold-level certified colleagues (number of colleagues)	N/A	N/A	2,373	3,031	3,065	3,332
Platinum-level certified colleagues (number of colleagues)	N/A	N/A	1,237	1,555	1,688	1,961
Employee Benefits						
Services provided through Comerica's Employee Assistance Program (# of instances)	N/A	4,570	4,499	3,854	4,671	4,433
Employees receiving tuition assistance (total number)	132	248	226	212	179	143
Value of tuition assistance received (\$)	852,680	886,599	801,200	814,508	686,694	529,993
Leadership Development Program (number of graduates) ¹²	47	49	44	29	29	—
Emerging Leaders Program (number of graduates) ¹²	N/A	N/A	N/A	N/A	N/A	47
Employee Awards (number of monetary awards to employees)	2,657	2,746	2,571	2,270	2,196	2,350
Value of Employee Awards (\$)	378,000	392,000	391,000	387,000	372,075	385,843
COMMUNITY						
Charitable gifts and corporate contributions (Millions \$)	9.1	8.4	8.8	8.8	8.1	8.0
Employee United Way contributions (Millions \$)	2.0	2.2	2.1	2.2	1.7	1.7
Employee time volunteered (hours)	71,000	72,186	73,970	73,800	59,350	67,967
Number of employee volunteers	2,300	2,514	2,543	2,853	2,286	2,039

¹ Gross revenue is comprised of net interest income and noninterest income.

² Source: S&P Global Market Intelligence.

³ The reduction in supplier diversity spend in 2017 (vs. 2016) was primarily related to a decrease in contingent labor spend with our two contingent labor suppliers who are diverse suppliers.

⁴ Total direct and indirect energy use- real estate only includes Natural Gas, Diesel Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and Chilled Water. Steam and chilled water through 2015. Estimated Natural Gas and Propane Gas for heat were new in 2015.

⁵ Comerica utilizes the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its greenhouse gas (GHG) emissions. Specific methodologies for estimating all Scope 1, Scope 2, and Scope 3 emissions shown in the above table, including activity data sources, estimation techniques, global warming potentials, and emission conversion factors, are disclosed in Comerica's most recent [CDP Response](#).

⁶ FedEx changed its shipping emissions calculation methodology in 2016 and also provided an updated emissions number for 2015 using the new methodology. Prior to 2015, the FedEx emissions numbers were not updated using the new methodology.

⁷ 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.

⁸As reported in Comerica's 2018 10-K Annual Report (page F-109).

⁹In 2016 we also began using a separate Human Resources-generated FTE number, which uses a slightly different calculation than the Annual Report FTE number and allows us to breakdown workers by individual locations. This allows for intensity metrics to be generated at the facility level. This FTE data was also generated for 2015. All intensity-based metrics use these numbers for 2015-2017.

¹⁰EEO-1 categories used for breakdown of Women and Racial/Ethnic Minority employee numbers.

¹¹MDA level listings are cumulative. If a colleague has been certified at the Platinum level, he/she is also counted in the bronze, silver and gold certification level.

¹²Since 2016, Comerica's Leadership Development Program is offered on a bi-annual basis (current program started Q1 2018). Our new bi-annual Emerging Leaders Program began in Q4 2017 with completion in Q1 2018).



Comerica Bank:
MEMBER FDIC. EQUAL OPPORTUNITY LENDER.

Comerica:
EQUAL OPPORTUNITY EMPLOYER.
Comerica Conducts Pre-Employment Drug Testing

REPORTING METHODOLOGY

Comerica's 2017 Corporate Responsibility Progress Report provides an update on our results for the period January 1 to December 31, 2017 (fiscal year 2017). Every two years, Comerica produces a comprehensive sustainability report based on the Global Reporting Initiative (GRI) framework. Our most recent GRI Standards-based report ([2016 Comerica Corporate Responsibility Report](#)) was issued in 2017. The focus of this report is to update our environmental sustainability and diversity and inclusion progress since our 2016 report. In some instances, 2017 data is included for comparison and, in limited instances, the report also references some projects and initiatives that stretched into 2018.

While the focus of our 2017 Corporate Responsibility Progress Report is on diversity and inclusion and environmental sustainability, we have also included other key economic, social, and governance metrics within our [Key Statistics Table](#). We have included an updated [GRI Content Index](#), which references the location of key data in both this report and our previous GRI Standards report. Our next GRI-based report will be published in mid-year 2019 to communicate our 2018 progress.

[The Comerica Promise and Our Core Values](#), in the Our Company section of this report, describe the way we engage with our colleagues, customers, and communities. They prescribe how we conduct business now and hereafter. By looking at corporate responsibility through these two key lenses, we are able to focus on the most critical issues and provide greater transparency into our corporate cultural priorities. As in previous reports, we balance our data presentation by reporting on both the progress we have made and the challenges we face in key areas.

Impact Topics 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 work we conducted in 2014-2015 and follow-up engagement in 2016-2017. While this report is focused on our environmental and diversity and inclusion-related Impact Topics, we recognize that these topics are intertwined with other economic, social and governance topics, although they are not explicitly discussed in detail in this progress report. A detailed discussion of Comerica's approach to the management of the company's Impact Topics, consistent with GRI Standards guidance, is included in [Comerica's Environmental, Social and Governance Impact Assessment](#) document and updated stakeholder engagement information for 2017 is provided in the [Stakeholder Engagement and Relevancy Assessment](#) section of this report. We have also mapped our Impact Topic groupings to the United Nations 17 Sustainable Development Goals (SDGs). In this report and in Comerica's ESG Impact Assessment, we use the terms "relevancy," "significance," and "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.

The report includes information about the sustainability risks and opportunities we face and supplements the information on our financial performance reported in our [2017 Comerica Incorporated Annual Report](#) (herein referred to as 2017 Annual Report). All information covers Comerica Incorporated and Subsidiaries (Comerica), and unless otherwise noted, is current as of December 31, 2017. References to the "Board" refer to the Board of Directors of Comerica Incorporated. You will also find references to employees and colleagues interchangeably. Longer-term contract workers who are not considered employees/colleagues at Comerica are referenced as contingent workers within this report.

We follow the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard (Revised Edition) to account for and calculate Scope 1 and 2 GHG emissions from our operations. In addition, we follow the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard to account for and calculate our Scope 3 GHG emissions. We obtained independent, third-party verification (level: limited assurance) for our 2016 and 2017 Scope 1, Scope 2, and Scope 3 GHG emissions. A copy of the verification

letter and details on Global Warming Potentials (GWP) and emission conversion factors used in our emissions reporting are included in our most recently published [Comerica Incorporated CDP Response](#) (herein referred to as our CDP Response).

In addition to GRI, Comerica acknowledges other sustainability reporting guidelines including those outlined by the Sustainability Accounting Standards Board (SASB) Financials sector standards and aspirational guides such as the United Nations SDGs. While not specifically designed to meet other reporting frameworks, the information presented in this report addresses some of the requested disclosures for the SASB Financials sector standards. Comerica will continue to monitor additional sustainability reporting guidelines for our future sustainability reporting efforts.

GRI Standards Content Index - Core

Please note: In this report, we use the terms “relevancy”, “significance”, and “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.

This report is not intended to meet all “Core” requirements of GRI Standards. This Content Index primarily serves as a limited update of the company’s 2016 response to GRI Standards standard disclosures, environmental, and diversity indicators. This Index includes updated information, where available, or refers to the 2016 GRI Standards-based report for information. In some instances, we have also included non-core GRI General Disclosures in this Content Index where we feel that we have met all or a portion of the requirements of the disclosure within the report or other externally published documents. We have also incorporated information on some topics within the Topic-Specific Disclosures, which we have determined to be “non-material” since that information may be of interest to our stakeholders. Those topic-specific disclosures which are not indicated as material and for which we do not provide significant content in this report have been omitted from this table.

GRI Standard Disclosure	Core vs Comprehensive	URL(s) or Direct Response	Omission
GRI 101: Foundation			
General Disclosures			
GRI 102: Organizational Profile			
102-1 Name of the organization	Core	This GRI Index: Comerica Bank	—
102-2 Activities, brands, products, and services	Core	This Report: Our Company	—
102-3 Location of headquarters	Core	This GRI Index: Comerica Corporate Headquarters: Comerica Bank Tower, 1717 Main Street Dallas, Texas 75201	—
102-4 Location of operations	Core	This Report: Our Company 2016 Corporate Responsibility Report: Page 9	—
102-5 Ownership and legal form	Core	2017 Annual Report	—
102-6 Markets served	Core	This Report: Our Company 2016 Corporate Responsibility Report: Page 9	—
102-7 Scale of the organization	Core	This Report: Our Company , Our Workforce , Key Statistics Table 2016 Corporate Responsibility Report: Pages 9, 51, 52, 79-84	—
102-8 Information on employees and other workers	Core	This Report: Our Company , Our Workforce , Key Statistics Table 2016 Corporate Responsibility Report: Pages 9, 40-48, 51-52, 79-84, 86	—
102-9 Supply chain	Core	This Report: Reducing Environmental Impacts in our Supply Chain , Our Suppliers 2016 Corporate Responsibility Report: Pages 9-10, 54-55, 72-73	—

GRI Standard Disclosure	Core vs Comprehensive	URL(s) or Direct Response	Omission
GRI 101: Foundation			
102-10 Significant changes to the organization and its supply chain	Core	2017 Annual Report This Report: Reducing Environmental Impacts in our Supply Chain, Our Suppliers	—
102-11 Precautionary Principle or approach	Core	2016 Corporate Responsibility Report: Pages 35-36	—
102-12 External initiatives	Core	This GRI Index: Comerica does not currently subscribe to or endorse externally developed charters or principles. This Report: Our Company	—
102-13 Membership of associations	Core	2016 Corporate Responsibility Report: Pages 35-36, 39, 54-55, 74-75	—
Strategy			
102-14 Statement from senior decision-maker	Core	2017 Annual Report This Report: Message from our Sustainability and Diversity Leadership 2016 Corporate Responsibility Report: Pages 5-8	—
102-15 Key impacts, risks, and opportunities	Comprehensive	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Environmental Risk Management Most Recent CDP Response 2016 Corporate Responsibility Report: Pages 11-14, 35-36	—
Ethics and integrity			
102-16 Values, principles, standards, and norms of behavior	Core	This Report: The Comerica Promise and Our Core Values 2016 Corporate Responsibility Report: Pages 9-11, 32-38	—
102-17 Mechanisms for advice and concerns about ethics	Comprehensive	Corporate Governance Guidelines 2016 Corporate Responsibility Report: Pages 10-11, 32-38, 40-48 This Report: The Comerica Promise and Our Core Values	—
Governance			
102-18 Governance structure	Core	Corporate Governance Guidelines 2016 Corporate Responsibility Report: Pages 5-6, 32-39	—
102-19 Delegating authority	Comprehensive	This Report: Message from our Sustainability and Diversity Leadership, Diversity and Inclusion, Environment 2016 Corporate Responsibility Report: Pages 5, 7-8, 32-36, 40-48, 49, 52, 57, 74-78	Disclosure partially met

GRI Standard Disclosure	Core vs Comprehensive	URL(s) or Direct Response	Omission
GRI 101: Foundation			
102-20 Executive-level responsibility for economic, environmental, and social topics	Comprehensive	This Report: Message from our Sustainability and Diversity Leadership, Diversity and Inclusion, Environment 2016 Corporate Responsibility Report: Pages 5, 7-8, 32-36, 40-48, 49, 52, 57, 74-78	Disclosure partially met
102-21 Consulting stakeholders on economic, environmental, and social topics	Comprehensive	This Report: Stakeholder Engagement and Relevancy Assessment Comerica ESG Impact Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
102-22 Composition of the highest governance body and its committees	Comprehensive	Corporate Governance Guidelines Proxy Statement 2016 Corporate Responsibility Report: Pages 32-33	—
102-23 Chair of the highest governance body	Comprehensive	Proxy Statement	—
102-24 Nominating and selecting the highest governance body	Comprehensive	This Report: Our Board Corporate Governance Guidelines Proxy Statement	—
102-25 Conflicts of interest	Comprehensive	Corporate Governance Guidelines Proxy Statement	—
102-26 Role of highest governance body in setting purpose, values, and strategy	Comprehensive	Proxy Statement Governance Overview web page	—
102-27 Collective knowledge of highest governance body	Comprehensive	Proxy Statement Governance Overview web page	—
102-28 Evaluating the highest governance body's performance	Comprehensive	Corporate Governance Guidelines, Governance Overview web page Proxy Statement 2016 Corporate Responsibility Report: Pages 32-33	—
102-29 Identifying and managing economic, environmental, and social impacts	Comprehensive	This Report: Stakeholder Engagement and Relevancy Assessment, Diversity Leadership & Accountability, Environment Most Recent CDP Response 2016 Corporate Responsibility Report: Pages 11-14, 35-36	—
102-30 Effectiveness of risk management processes	Comprehensive	2016 Corporate Responsibility Report: Pages 35-36, 68-69 Most Recent CDP Response	—

GRI Standard Disclosure	Core vs Comprehensive	URL(s) or Direct Response	Omission
GRI 101: Foundation			
102-31 Review of economic, environmental, and social topics	Comprehensive	This Report: Message from our Sustainability and Diversity Leadership, Stakeholder Engagement and Relevancy Assessment Governance Overview web page Most Recent CDP Response 2016 Corporate Responsibility Report: Pages 11-14, 32-33	—
102-32 Highest governance body's role in sustainability reporting	Comprehensive	This Index: Our CFO reviews and approves Comerica's Corporate Responsibility Reports and CDP Climate Change Response	—
102-33 Communicating critical concerns	Comprehensive	2016 Corporate Responsibility Report: Pages 11-14, 32-33	—
102-34 Nature and total number of critical concerns	Comprehensive	—	—
102-35 Remuneration policies	Comprehensive	Proxy Statement Corporate Governance Guidelines 2016 Corporate Responsibility Report: Pages 34, 53	—
102-36 Process for determining remuneration	Comprehensive	Proxy Statement Corporate Governance Guidelines 2016 Corporate Responsibility Report: Pages 34, 53	—
102-37 Stakeholders involvement in remuneration	Comprehensive	Proxy Statement Corporate Governance Guidelines 2016 Corporate Responsibility Report: Pages 34, 53	—
102-38 Annual total compensation ratio	Comprehensive	—	—
102-39 Percentage increase in annual total compensation ratio	Comprehensive	—	—
Stakeholder engagement			
102-40 List of stakeholder groups	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
102-41 Collective bargaining agreements	Core	2016 Corporate Responsibility Report: Page 88	—
102-42 Identifying and selecting stakeholders	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
102-43 Approach to stakeholder engagement	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—

GRI Standard Disclosure	Core vs Comprehensive	URL(s) or Direct Response	Omission
GRI 101: Foundation			
102-44 Key topics and concerns raised	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
Reporting practice			
102-45 Entities included in the consolidated financial statements	Core	2017 Annual Report	—
102-46 Defining report content and topic Boundaries	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
102-47 List of material topics	Core	This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14	—
102-48 Restatements of information	Core	2016 Corporate Responsibility Report: Page 88	—
102-49 Changes in reporting	Core	This Report: Message from our Sustainability and Diversity Leadership, Reporting Methodology 2016 Corporate Responsibility Report: Pages 7-8, 85	—
102-50 Reporting period	Core	This Report: Reporting Methodology 2016 Corporate Responsibility Report: Page 85	—
102-51 Date of most recent report	Core	This Report: Reporting Methodology 2016 Corporate Responsibility Report: Page 85	—
102-52 Reporting cycle	Core	This Report: Reporting Methodology 2016 Corporate Responsibility Report: Page 85	—
102-53 Contact point for questions regarding the report	Core	This Report: Reporting Methodology 2016 Corporate Responsibility Report: Page 85	—
102-54 Claims of reporting in accordance with the GRI Standards	Core	This Report: Reporting Methodology 2016 Corporate Responsibility Report: Page 85	—
102-55 GRI content index	Core	This GRI Content Index	—
102-56 External assurance	Core	Most Recent CDP Response	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Topic-Specific Disclosures				
GRI 200 Economic Standard Series				
Economic Performance		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	This Report: Stakeholder Engagement and Relevancy Assessment Comerica ESG Impact Assessment 2016 Corporate Responsibility Report: Pages 11-14, 16-18	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 16-18	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 16-18	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	Yes	This Report: Key Statistics Table 2016 Corporate Responsibility Report: Pages 16-18	—
	201-2 Financial implications and other risks and opportunities due to climate change	Yes	This Report: Managing Environmental Impacts of our Operations, Climate Change, Energy and GHG Emissions, Green Lending Most Recent CDP Response Proxy Statement	—
Market Presence		No		
Indirect Economic Impacts		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14, 20-21	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 18-21, 29-30, 74-78	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 18-21, 29-30, 74-78	—
GRI 203: Indirect Economic Impacts	203-1 Infrastructure investments and services supported	Yes	2016 Corporate Responsibility Report: Pages 18-21, 29-30, 74-78	—
	203-2 Significant indirect economic impacts	Yes	2016 Corporate Responsibility Report: Pages 18-21, 29-30, 74-78	—
Procurement Practices		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Reducing Environmental Impacts in our Supply Chain, Our Suppliers 2016 Corporate Responsibility Report: Pages 9-10, 11-14	—
	103-2 The management approach and its components	No	This Report: Reducing Environmental Impacts in our Supply Chain, Our Suppliers 2016 Corporate Responsibility Report: Pages 9-10	—
	103-3 Evaluation of the management approach	No	This Report: Reducing Environmental Impacts in our Supply Chain, Our Suppliers 2016 Corporate Responsibility Report: Pages 9-10, 72-73	—
GRI 204: Procurement Practices	204-1 Proportion of spending on local suppliers	No	This Report: Reducing Environmental Impacts in our Supply Chain, Our Suppliers 2016 Corporate Responsibility Report: Pages 9-10	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Anti-corruption		Yes		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14, 36-38	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 36-38	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 36-38	—
GRI 205: Anti-corruption	205-1 Operations assessed for risks related to corruption	Yes	2016 Corporate Responsibility Report: Pages 32-38	—
	205-2 Communication and training about anti-corruption policies and procedures	Yes	2016 Corporate Responsibility Report: Pages 36-38	—
	205-3 Confirmed incidents of corruption and actions taken	Yes	2016 Corporate Responsibility Report: Pages 36-38	—
Anti-competitive Behavior		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 11-14, 38	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 11-14, 36-38	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 11-14, 36-38	—
GRI 206: Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Yes	2016 Corporate Responsibility Report: Pages 11-14, 38	—
GRI 300 Environmental Standards Series				
Materials		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Managing Environmental Impacts of our Operations, Material Consumption	—
	103-2 The management approach and its components	Yes	This Report: Managing Environmental Impacts of our Operations, Material Consumption	—
	103-3 Evaluation of the management approach	Yes	This Report: Managing Environmental Impacts of our Operations, Material Consumption	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
GRI 301: Materials	301-1 Materials used by weight or volume	Yes	This Report: Material Consumption, Key Statistics Table	—
	301-2 Recycled input materials used	Yes	This Report: Material Consumption, Key Statistics Table	—
	301-3 Reclaimed products and their packaging materials	Yes	This Report: Material Consumption, Key Statistics Table	—
Energy		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Climate Change, Energy and GHG Emissions	—
	103-2 The management approach and its components	Yes	This Report: Climate Change, Energy and GHG Emissions	—
	103-3 Evaluation of the management approach	Yes	This Report: Climate Change, Energy and GHG Emissions	—
GRI 302: Energy	302-1 Energy consumption within the organization	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
	302-2 Energy consumption outside of the organization	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
	302-3 Energy intensity	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
GRI 302: Energy	302-4 Reduction of energy consumption	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
	302-5 Reductions in energy requirements of products and services	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
Water		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Water Stewardship	—
	103-2 The management approach and its components	Yes	This Report: Water Stewardship	—
	103-3 Evaluation of the management approach	Yes	This Report: Water Stewardship, Key Statistics Table	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
GRI 303: Water	303-1 Water withdrawal by source	Yes	This Report: Water Stewardship, Key Statistics Table	Although we have a couple wells in Michigan for irrigation purposes, the only water metric that we are able to measure is the water which is sourced through local utilities and is tracked through the utility water meter.
Biodiversity		No		
Emissions		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Climate Change, Energy and GHG Emissions	—
	103-2 The management approach and its components	Yes	This Report: Climate Change, Energy and GHG Emissions	—
	103-3 Evaluation of the management approach	Yes	This Report: Climate Change, Energy and GHG Emissions	—
	305-1 Direct (Scope 1) GHG emissions	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
	305-2 Energy indirect (Scope 2) GHG emissions	Yes	Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
GRI 103: Management Approach	305-3 Other indirect (Scope 3) GHG emissions	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—
	305-4 GHG emissions intensity	Yes	This Report: Key Statistics Table Most Recent CDP Response	—
	305-5 Reduction of GHG emissions	Yes	This Report: Climate Change, Energy and GHG Emissions, Key Statistics Table Most Recent CDP Response	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Effluents and Waste		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment , Material Consumption	—
	103-2 The management approach and its components	Yes	This Report: Environment , Material Consumption	—
	103-3 Evaluation of the management approach	Yes	This Report: Environment , Material Consumption , Water Stewardship	—
GRI 306: Effluents and Waste	306-2 Waste by type and disposal method	Yes	This Report: Material Consumption , Key Statistics Table	—
Environmental Compliance		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment , Environmental Risk Management	—
	103-2 The management approach and its components	Yes	This Report: Environmental Risk Management	—
	103-3 Evaluation of the management approach	Yes	This Report: Environmental Risk Management	—
GRI 307: Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	Yes	There were no significant fines or monetary sanctions associated with non-compliance of environmental laws and regulations in 2017 that would have a material adverse effect on our operations or ability to perform the services we offer.	—
Supplier Environmental Assessment		No		
GRI 308: Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	No	This Report: Reducing Environmental Impacts in our Supply Chain	—
GRI 400 Social Standards Series				
Employment		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment , Our Workforce 2016 Corporate Responsibility Report: Pages 11-14, 41-48	—
	103-2 The management approach and its components	Yes	This Report: Our Workforce 2016 Corporate Responsibility Report: Pages 41-48	—
	103-3 Evaluation of the management approach	Yes	This Report: Our Workforce 2016 Corporate Responsibility Report: Pages 41-48	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
GRI 401: Employment	401-1 New employee hires and employee turnover	Yes	2016 Corporate Responsibility Report: Pages 41-46	—
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Yes	2016 Corporate Responsibility Report: Pages 41-46	—
Labor/Management Relations		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 40-48	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 40-48	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 40-48	—
GRI 402: Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	Yes	2016 Corporate Responsibility Report: Page 93	—
Occupational Health and Safety		No		
Training and Education		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Diversity Awareness & Learning, Employee Sustainability Engagement 2016 Corporate Responsibility Report: Pages 41-46	—
	103-2 The management approach and its components	Yes	This Report: Diversity Awareness & Learning, Employee Sustainability Engagement 2016 Corporate Responsibility Report: Pages 41-46	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 41-46	—
GRI 404: Training and Education	404-1 Average hours of training per year per employee	Yes	This Report: Diversity Awareness & Learning, Employee Sustainability Engagement 2016 Corporate Responsibility Report: Pages 41-46	—
	404-2 Programs for upgrading employee skills and transition assistance programs	Yes	2016 Corporate Responsibility Report: Pages 41-46	—
GRI 404: Training and Education	404-3 Percentage of employees receiving regular performance and career development reviews	Yes	2016 Corporate Responsibility Report: Pages 41-46	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Diversity and Equal Opportunity		Yes		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Leadership and Accountability, Our Workforce, Our Board, Our Customers, Our Community/Employee Involvement, Our Suppliers 2016 Corporate Responsibility Report: Pages 11-14, 32-33, 49-55	—
	103-2 The management approach and its components	Yes	This Report: Leadership and Accountability, Our Workforce, Our Board, Our Customers, Our Community/Employee Involvement, Our Suppliers 2016 Corporate Responsibility Report: Pages 32-33, 49-55	—
	103-3 Evaluation of the management approach	Yes	This Report: Leadership and Accountability, Our Workforce, Our Board, Our Customers, Our Community/Employee Involvement, Our Suppliers 2016 Corporate Responsibility Report: Pages 32-33, 49-55	—
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Yes	This Report: Our Workforce, Our Board, Key Statistics Table 2016 Corporate Responsibility Report: Pages 32-33, 49-55	—
	405-2 Ratio of basic salary and remuneration of women to men	Yes	This Report: Employee Demographics 2016 Corporate Responsibility Report: Page 53	Requested metric not provided in report. Aggregated data on remuneration without detailed accompanying context makes broad comparisons difficult.
Non-discrimination		No		
Freedom of Association and Collective Bargaining		No		
Child Labor		No		
Forced or Compulsory Labor		No		
Security Practices		No		
Rights of Indigenous Peoples		No		

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Human Rights Assessment		No		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	No	2016 Corporate Responsibility Report: Pages 36-38	—
	103-2 The management approach and its components	No	2016 Corporate Responsibility Report: Pages 36-38	—
	103-3 Evaluation of the management approach	No	2016 Corporate Responsibility Report: Pages 36-38	—
GRI 412: Human Rights Assessment	412-1 Operations that have been subject to human rights reviews or impact assessments	No	2016 Corporate Responsibility Report: Page 38	—
	412-2 Employee training on human rights policies or procedures	No	2016 Corporate Responsibility Report: Pages 36-38	—
	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	No	2016 Corporate Responsibility Report: Pages 36-38	—
Local Communities		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment, Our Community/ Employee Involvement 2016 Corporate Responsibility Report: Pages 11-14, 74-78	—
GRI 413: Local Communities	103-2 The management approach and its components	Yes	This Report: Stakeholder Engagement and Relevancy Assessment, Our Community/ Employee Involvement 2016 Corporate Responsibility Report: Pages 11-14, 20-21, 35-36, 74-78	—
GRI 413: Local Communities	103-3 Evaluation of the management approach	Yes	This Report: Stakeholder Engagement and Relevancy Assessment, Our Community/ Employee Involvement 2016 Corporate Responsibility Report: Pages 11-14, 20-21, 35-36, 74-78	—
	413-1 Operations with local community engagement, impact assessments, and development programs	Yes	This Report: Stakeholder Engagement and Relevancy Assessment, Our Community/ Employee Involvement, Key Statistics Table 2016 Corporate Responsibility Report: Pages 11-14, 20-21, 35-36, 74-78	—
Supplier Social Assessment		No		

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Public Policy		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Page 39	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Page 39	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Page 39	—
GRI 415: Public Policy	415-1 Political contributions	Yes	2016 Corporate Responsibility Report: Page 39	—
Customer Health & Safety		No		
Marketing and Labeling		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Page 38	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Page 38	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Page 38	—
GRI 417: Marketing and Labeling	417-1 Requirements for product and service information and labeling	Yes	2016 Corporate Responsibility Report: Page 38	—
	417-2 Incidents of non-compliance concerning product and service information and labeling	Yes	2016 Corporate Responsibility Report: Page 95	—
	417-3 Incidents of non-compliance concerning marketing communications	Yes	2016 Corporate Responsibility Report: Page 38	—
Customer Privacy		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 22-31	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 23-25	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 23-25	—
GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Yes	2016 Corporate Responsibility Report: Pages 23-25	—

GRI Standard	Disclosure	Is this topic material?	URL(s) or Direct Comments	Omission
Socioeconomic Compliance		Yes		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Yes	Comerica ESG Impact Assessment This Report: Stakeholder Engagement and Relevancy Assessment 2016 Corporate Responsibility Report: Pages 16-21	—
	103-2 The management approach and its components	Yes	2016 Corporate Responsibility Report: Pages 16-21	—
	103-3 Evaluation of the management approach	Yes	2016 Corporate Responsibility Report: Pages 16-21	—
GRI 419: Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	Yes	2016 Corporate Responsibility Report: Page 96	—