

## Voluntary Carbon Market Disclosures Act Disclosure

Comerica understands that protecting and preserving the environment is important to the health and well-being of the people, businesses and communities we serve. As such, we are committed to incorporating environmental stewardship considerations into the ways we do business, allowing us to support our customers, further integrate climate matters into our business, and reducing our emissions footprint.

California's Voluntary Carbon Market Disclosures Act requires disclosures from companies regarding their interactions with voluntary carbon markets and associated claims made with respect to reductions in greenhouse gas emissions.

Comerica does not currently make claims regarding the achievement of net zero emissions, claim a product is "carbon neutral," or make other claims implying Comerica does not add net carbon dioxide or greenhouse gases (GHG) to the atmosphere. Comerica has not made significant reductions to its net carbon dioxide or greenhouse gas emissions using voluntary carbon offsets.

Though not required under the Voluntary Carbon Market Disclosures Act, Comerica is disclosing information on the small quantities of carbon offsets we purchased in 2024 against our 2023 emissions. The voluntary carbon offsets are used to offset the emissions associated with Comerica's Scope 1 travel emissions; however, Comerica does not currently use the offsets to claim a reduction in Scope 1 emissions. Carbon offsets purchased in 2024 (900 tons CO<sub>2</sub>e) are matched to our 2023 Scope 1 travel emissions (898 tons CO<sub>2</sub>e). The carbon offsets are associated with the Clinton Landfill Gas Collection and Combustion Project located in Clinton, Illinois. These carbon offsets are listed in the Verra Registry and are of a 2022 vintage.

Comerica's publicly stated GHG reduction goals are as follows:

- 50% reduction by 2025
- 65% reduction by 2030
- 100% reduction by 2050

These goals are for Scope 1 and Scope 2 (location-based) emissions relative to a 2012 baseline. As of year-end 2023, Comerica has reduced these operational emissions approximately 57% from our 2012 baseline. These goals are not indicated to support claims of carbon neutrality, net zero emissions, or other science-based GHG reduction targets. It should also be noted that voluntary carbon offsets purchased by Comerica are not used to reduce our overall reported Scope 1 and Scope 2 (location and market-based) GHG emissions or factored into our reported progress on our GHG reduction goals for 2023.

This disclosure is based on GHG emissions information published in [Comerica's 2023 Corporate Responsibility Report](#), and [2024 CDP Climate Change Questionnaire Response](#) (which all reflect GHG emissions through 12/31/2023), along with information in our [2023 TCFD Report](#). These referenced documents contain the methodologies, assumptions and other information used to support our GHG emissions reporting and progress against our stated emissions reductions goals. Comerica's Scope 1, 2 and 3 GHG emissions are externally verified by a third party at the limited assurance level, as detailed in the respective [GHG Emissions Verification Declaration](#). Comerica will provide updated information as required under California's Voluntary Carbon Market Disclosure Act no less than annually. Comerica invites you to learn more about our approach to Sustainability at [Comerica.com/sustainability](https://www.comerica.com/sustainability).