



Comerica



DESCRIPTION:

Comerica scored a 100 on the 2023 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group. By complying with the HRC's controversial demands, Comerica increases the risk of dividing employees, alienating customers and harming shareholders. The company covers transgender-related medical costs for its employees and their children and provides specific sexual orientation and gender identity-based benefits. It also uses sex and gender ideology criteria in employee recruitment, vendor selection, marketing, and philanthropic support. Comerica forces employees to undergo multiple ideological trainings and uses its reputation, corporate funds, and political influence to support controversial sex and gender ideologies, organizations, and legislation. Comerica has set specific climate-related goals and targets it expects its suppliers to abide by. The company is committed to micro-aggression and bias trainings and has a supplier diversity program. Comerica is a member of the Partnership for Carbon Accounting Financials, committed to net zero carbon emissions by 2050. For these reasons, Comerica receives a High Risk rating.

Corporate Weaponization

Has denied service to customers, suppliers, or vendors due to their political views or religiousMedium Riskbeliefs OR corporately boycotts, divests, or sanctions regions, people groups, or industries.Medium Risk

Comerica received a score of 1002023 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group. The company recruit's employees based on sexual identity issues. The company discriminates against vendors that do not promote divisive sex and gender policies, indicating it prioritizes sexual issues over merit (<u>1)(2).3</u>). However, Comerica has not publicly terminated business relationships due to religious beliefs or political views.

Charitable giving (including employee matching programs) policies or practices discriminate High Risk against charitable organizations based on views or religious beliefs.

ComericaHRC CEI rating indicates the company will not donate to non-religious charities unless they embrace controversial sexual identity policies (<u>1</u>)(<u>2</u>).

Employment policies fail to protect against discrimination based on political affiliation/views High Risk and/or religion.

Comericaindicates the company forces employees to attend multiple, controversial trainings on gender identity, sexual orientation, transgender issues, and divisive racial ideology. The company provides gender transition guidelines for its employees and a specific benefits guide with a comprehensive explanation of transgender services funded by the company $(\underline{1})(\underline{2})$. The company prioritizes

diversity in its supply chain (3). Comerica 4)(5)(6)(7). The company does not provide viewpoint protections for its employees (8).

Corporate Governance and Public Policy

Uses corporate reputation to support ideological causes and/or organizations hostile to freedom High Risk of expression.

Comericang indicates the company agrees to allow a controversial stakeholder group focused on sexual identity issues to dictate marketing or advertising strategy (<u>1</u>)(<u>2</u>). By doing so, the company risks dividing employees, alienating customers and harming shareholders. The company is a member of the Partnership for Carbon Accounting

Financials, committed to net zero carbon emissions by 2050 (3)(4).

Uses corporate funds to advance ideological causes, organizations, or policies hostile to freedom High Risk of expression.

Comericaindicates the company covers transgender related costs for its employees and their children, including paid short-term leave, puberty blockers, cross-sex hormones, chest surgeries, genital surgeries, medical visits and lab monitoring, travel and lodging. Additionally, the company has pledged philanthropic support of at least one organization or event that promotes sex and gender ideology (<u>1</u>)(<u>2</u>). By allowing a political stakeholder group to dictate operations, the company increases health care costs and risks dividing employees, alienating customers and harming shareholders.

Uses corporate political contributions for ideological, non-business purposes.

High Risk

Comericaindicates the company publicly advocated for controversial sex and gender ideology through local, state or federal legislation or initiatives (<u>1)(2</u>). By allowing a political stakeholder group to dictate operations, the company risks dividing employees, alienating customers and harming shareholders. Comerica has not used its PAC donations for ideological purposes and does not report on its lobbying at this time (<u>3)(4)(5</u>).

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