



# 2024 SASB Index

The index below is a complement to KeyCorp’s 2024 Corporate Responsibility Report. The disclosures below relate to the Sustainability Accounting Standards Board (SASB) sector standards that are relevant to our business: Asset Management & Custody Activities; Commercial Banks; Consumer Finance; Investment Banking & Brokerage; and Mortgage Finance. Responses are made in accordance with SASB’s Industry Standards Version 2023-12. Unless otherwise noted, all data and descriptions apply to the entire firm and are as of or for the year ended December 31, 2024. Unless otherwise specified, all data and descriptions apply to our entire operations as of the end of each of the indicated response years.

Certain information recommended by the SASB framework is not disclosed below because that information (i) is privileged or confidential; (ii) is proprietary; or (iii) is not currently collected in alignment with the related SASB metric.

This report is not intended to be comprehensive and thus should be read in conjunction with the other documents and resources that are referenced and linked in our responses. Additional KeyCorp corporate responsibility disclosures can be found at [key.com/crreport](https://www.key.com/crreport).

## Topics In Multiple Sector Standards

### Data Security

| Metric                       | Description                                                                                                         | Response                                                                                                                |
|------------------------------|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| FN-CB-230a.1<br>FN-CF-230a.1 | (1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected | See “Item 1C: Cybersecurity” section of our <a href="#">2024 Form 10-K</a>                                              |
| FN-CB-230a.2<br>FN-CF-230a.3 | Description of approach to identifying and addressing data security risks                                           | See “Item 1C: Cybersecurity” section of our <a href="#">2024 Form 10-K</a><br><a href="#">Data privacy and security</a> |



## Business Ethics

| Metric                                       | Description                                                                                                                                                                                                                              | Response                                                                                                                                                                                 |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-CB-510a.1<br>FN-AC-510a.1<br>FN-IB-510a.1 | Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |
| FN-CB-510a.2<br>FN-AC-510a.2<br>FN-IB-510a.2 | Description of whistleblower policies and procedures                                                                                                                                                                                     | See "We Respect the Code" section of our <a href="#">Code of Business Conduct and Ethics</a>                                                                                             |

## Systemic Risk Management

| Metric                       | Description                                                                                                                                                                      | Response                                                                                                                                                                                                        |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-CB-550a.1<br>FN-IB-550a.1 | Global Systemically Important Bank (G-SIB) score, by category                                                                                                                    | Not applicable, KeyBank is not a G-SIB                                                                                                                                                                          |
| FN-CB-550a.2<br>FN-IB-550a.2 | Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities | See "Capital Planning and Stress Testing" section of our <a href="#">2024 Form 10-K</a><br>See "Enhanced prudential standards and early remediation requirements" section of our <a href="#">2024 Form 10-K</a> |



## Commercial Bank (CB)

### Financial Inclusion & Capacity Building

| Metric       | Description                                                                                                                                                                       | Response                                                                                                                                |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| FN-CB-240a.1 | (1) Number and (2) amount of loans outstanding that qualify for programs designed to promote small business and community development                                             | Not disclosed, see 2024 SASB Index introduction                                                                                         |
| FN-CB-240a.2 | (1) Number and (2) amount of past due and nonaccrual loans or loans subject to forbearance that qualify for programs designed to promote small business and community development | Not disclosed, see 2024 SASB Index introduction                                                                                         |
| FN-CB-240a.3 | Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers                                                                               | For discussion, see <a href="#">Inclusive products and services</a> ; number of accounts not reported, see 2024 SASB Index introduction |
| FN-CB-240a.4 | Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers                                                                      | For discussion, see <a href="#">Inclusive products and services</a> ; number of accounts not reported, see 2024 SASB Index introduction |

### Incorporation of Environmental, Social, & Governance Factors in Credit Analysis

| Metric       | Description                                                                                                        | Response                         |
|--------------|--------------------------------------------------------------------------------------------------------------------|----------------------------------|
| FN-CB-410a.2 | Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis | <a href="#">2023 TCFD Report</a> |



## Activity Metrics

| Metric      | Description                                                                                               | Response                                                                                                  |
|-------------|-----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| FN-CB-000.A | (1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business | See “Figure 18: Breakdown of Deposits at December 31, 2024” section in our <a href="#">2024 Form 10-K</a> |
| FN-CB-000.B | (1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate         | See “Note 4: Loan Portfolio” section in our <a href="#">2024 Form 10-K</a>                                |

## Consumer Finance (CF)

### Customer Privacy

| Metric       | Description                                                                                       | Response                                                                                                                                                                                 |
|--------------|---------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-CF-220a.1 | Number of account holders whose information is used for secondary purposes                        | Not disclosed, see 2024 SASB Index introduction                                                                                                                                          |
| FN-CF-220a.2 | Total amount of monetary losses as a result of legal proceedings associated with customer privacy | See ‘Legal Proceedings’ under “Note 22: Commitments, Contingent Liabilities, and Guarantees” section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |

### Data Security

| Metric       | Description                                                                              | Response                                        |
|--------------|------------------------------------------------------------------------------------------|-------------------------------------------------|
| FN-CF-230a.2 | Card-related fraud losses from (1) card-not-present fraud and (2) card-present and other | Not disclosed, see 2024 SASB Index introduction |



## Selling Practices

| Metric       | Description                                                                                                                                                                                             | Response                                                                                                                                                                                                                               |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-CF-270a.1 | Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold                                                                          | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                        |
| FN-CF-270a.2 | Approval rate for (1) credit and (2) pre-paid products for applicants                                                                                                                                   | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                        |
| FN-CF-270a.3 | (1) Average fees from add-on products, (2) average APR of credit products, (3) average age of credit products, (4) average number of credit accounts, and (5) average annual fees for pre-paid products | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                        |
| FN-CF-270a.4 | (1) Number of customer complaints filed<br>(2) percentage with monetary or non-monetary relief                                                                                                          | See the CFPB's Consumer Complaint Database<br>See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |
| FN-CF-270a.5 | Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products                                                                                      | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings                                               |

## Activity Metrics

| Metric      | Description                                                                                           | Response                                        |
|-------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| FN-CF-000.A | Number of unique consumers with an active (1) credit card account and (2) pre-paid debit card account | Not disclosed, see 2024 SASB Index introduction |
| FN-CF-000.B | Number of (1) credit card accounts and (2) prepaid debit card accounts                                | Not disclosed, see 2024 SASB Index introduction |



## Asset Management & Custody Activities (AC)

### Transparent Information & Fair Advice for Customers

| Metric       | Description                                                                                                                                                                                                                      | Response                                                                                                                                                                                 |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-AC-270a.1 | (1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings | Not disclosed, see 2024 SASB Index introduction                                                                                                                                          |
| FN-AC-270a.2 | Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers                                             | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |
| FN-AC-270a.3 | Description of approach to informing customers about products and services                                                                                                                                                       | <a href="#">Wealth Management</a>                                                                                                                                                        |



# Incorporation of Environmental, Social, & Governance Factors in Investment Mgmt. & Advisory

| Metric       | Description                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-AC-410a.1 | Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| FN-AC-410a.2 | Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies                              | Key Private Bank (KPB) sustainable investing platform covers Socially Responsible Investing; Sustainable Investing; and Impact Investing. Key Private Bank offers approximately 20 sustainability oriented investment strategies covering both active and passive strategies, one private equity fund, and an internally managed strategy, the Key Sustainable Equity Advantage (SEA) strategy that invests in approximately 50 U.S. publicly traded equities that meet our sustainability related criteria. These investment strategies span a wide array of asset classes including U.S. and non-U.S. equities and fixed-income assets. In total, KPB sustainable investment strategies are designed for clients who seek to align their portfolios more closely with their unique values focused on promoting positive, sustainable corporate policies and practices. KPB sustainable investment strategies integrate sustainability factors that have historically helped reduce business risk and create long-term value. These investment strategies seek to provide diversified favorable risk-adjusted return outcomes while also focusing on sustainability and promoting positive corporate responsibility policies and practices. |
| FN-AC-410a.3 | Description of proxy voting and investor engagement policies and procedures                                                                                                                  | The Key Private Bank (KPB) Proxy Voting Policy generally leverages the recommendations of the ISS U.S. Proxy Voting Guidelines, except for specific areas where KPB has chosen to apply a set of governance principles that consider environmental and socially sustainable business practices. The policy is reviewed on at least an annual basis by the KPB Proxy Committee in consultation with the ISS Custom Research team.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## Activity Metrics

| Metric      | Description                                | Response                                                                                                |
|-------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------|
| FN-AC-000.A | Total assets under management (AUM)        | See “Figure 4: Assets Under Management or Administration” section of our <a href="#">2024 Form 10-K</a> |
| FN-AC-000.B | Total assets under custody and supervision | Not disclosed, see 2024 SASB Index introduction                                                         |



## Investment Banking & Brokerage (IB)

### Incorporation of Environmental, Social, and Governance Factors in Investment Banking & Brokerage Activities

| Metric       | Description                                                                                                                                                                    | Response                                        |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| FN-IB-410a.1 | Revenue from (1) underwriting, (2) advisory, and (3) securitization transactions incorporating integration of environmental, social, and governance (ESG) factors, by industry | Not disclosed, see 2024 SASB Index introduction |
| FN-IB-410a.2 | (1) Number and (2) total value of investments and loans incorporating integration of environmental, social, and governance (ESG) factors, by industry                          | Not disclosed, see 2024 SASB Index introduction |
| FN-IB-410a.3 | Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies                | Not disclosed, see 2024 SASB Index introduction |





## Professional Integrity

| Metric       | Description                                                                                                                                                                                                                     | Response                                                                                                                                                                                 |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-IB-510b.1 | (1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigation, or other regulatory proceedings | Not disclosed, see 2024 SASB Index introduction                                                                                                                                          |
| FN-IB-510b.2 | Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party                                                                                                              | Not disclosed, see 2024 SASB Index introduction                                                                                                                                          |
| FN-IB-510b.3 | Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care                                                                                                 | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |
| FN-IB-510b.4 | Description of approach to ensuring professional integrity, including duty of care                                                                                                                                              | See our <a href="#">Code of Business Conduct and Ethics</a>                                                                                                                              |

## Employee Incentives & Risk Taking

| Metric       | Description                                                                                                              | Response                                        |
|--------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| FN-IB-550b.1 | Percentage of total remuneration that is variable for Material Risk Takers (MRTs)                                        | Not disclosed, see 2024 SASB Index introduction |
| FN-IB-550b.2 | Percentage of variable remuneration of Material Risk Takers (MRTs) to which malus or clawback provisions were applied    | Not disclosed, see 2024 SASB Index introduction |
| FN-IB-550b.3 | Discussion of policies around supervision, control, and validation of traders' pricing of Level 3 assets and liabilities | Not disclosed, see 2024 SASB Index introduction |



Activity Metrics

| Metric      | Description                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                      |      |              |                          |           |           |                  |       |           |                  |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|--------------|--------------------------|-----------|-----------|------------------|-------|-----------|------------------|
| FN-IB-000.A | (1) Number and (2) value of (a) underwriting, (b) advisory, and (c) securitization transactions                                                   | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                                                                                                                                                                                                               |      |              |                          |           |           |                  |       |           |                  |
| FN-IB-000.B | (1) Number and (2) value of proprietary investments and loans by sector                                                                           | None                                                                                                                                                                                                                                                                                                                                                                                                                          |      |              |                          |           |           |                  |       |           |                  |
| FN-IB-000.C | (1) Number and (2) value of market-making transactions in (a) fixed income, (b) equity, (c) currency, (d) derivatives, and (e) commodity products | <p>Key only makes markets in equity securities. The following represents the number and dollar amount of buy and sell trades in fiscal year 2024 for equity market-making activities.</p> <table><tr><th>Type</th><th>Transactions</th><th>\$ Value of Transactions</th></tr><tr><td>Purchases</td><td>2,126,860</td><td>\$16,613,058,920</td></tr><tr><td>Sales</td><td>2,323,902</td><td>\$16,609,370,665</td></tr></table> | Type | Transactions | \$ Value of Transactions | Purchases | 2,126,860 | \$16,613,058,920 | Sales | 2,323,902 | \$16,609,370,665 |
| Type        | Transactions                                                                                                                                      | \$ Value of Transactions                                                                                                                                                                                                                                                                                                                                                                                                      |      |              |                          |           |           |                  |       |           |                  |
| Purchases   | 2,126,860                                                                                                                                         | \$16,613,058,920                                                                                                                                                                                                                                                                                                                                                                                                              |      |              |                          |           |           |                  |       |           |                  |
| Sales       | 2,323,902                                                                                                                                         | \$16,609,370,665                                                                                                                                                                                                                                                                                                                                                                                                              |      |              |                          |           |           |                  |       |           |                  |



## Mortgage Finance (MF)

### Lending Practices

| Metric       | Description                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                   |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-MF-270a.1 | (1) Number and (2) value of residential mortgages of the following types: (a) combined fixed- and variable-rate, (b) prepayment penalty, (c) total | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                                                                                                                                                            |
| FN-MF-270a.2 | (1) Number and (2) value of (a) residential mortgage modifications, (b) foreclosures, and (c) short sales or deeds in lieu of foreclosure          | Loan modifications are handled on a case-by-case basis and are negotiated to achieve mutually agreeable terms that maximize loan collectability and meet the borrower's financial needs. See "Loans" section (pg. 110) of our <a href="#">2024 Form 10-K</a> for information on troubled debt restructuring.<br><br><a href="#">Financial Hardship Assistance Programs</a> |
| FN-MF-270a.3 | Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators   | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings                                                                                                                                                                                   |
| FN-MF-270a.4 | Description of remuneration structure of mortgage loan originators                                                                                 | Not disclosed, see 2024 SASB Index introduction                                                                                                                                                                                                                                                                                                                            |

### Discriminatory Lending

| Metric       | Description                                                                                                                               | Response                                                                                                                                                                                 |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FN-MF-270b.1 | (1) Number, (2) value, and (3) weighted average Loan-to-Value (LTV) ratio of mortgages issued to (a) minority and (b) all other borrowers | Not disclosed, see 2024 SASB Index introduction                                                                                                                                          |
| FN-MF-270b.2 | Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending                          | See 'Legal Proceedings' under "Note 22: Commitments, Contingent Liabilities, and Guarantees" section in our <a href="#">2024 Form 10-K</a> , for a summary of material legal proceedings |



## Discriminatory Lending continued

|              |                                                                                             |                                                                                                                         |
|--------------|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| FN-MF-270b.3 | Description of policies and procedures for ensuring non-discriminatory mortgage origination | The Secure and Fair Enforcement for Mortgage Licensing Act ( <a href="#">SAFE Act</a> )<br><a href="#">Home lending</a> |
|--------------|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|

## Environmental Risk to Mortgaged Properties

| Metric       | Description                                                                                                                                                                      | Response                                        |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| FN-MF-450a.1 | (1) Number and (2) value of mortgage loans in 100-year flood zones                                                                                                               | Not disclosed, see 2024 SASB Index introduction |
| FN-MF-450a.2 | (1) Total expected loss and (2) Loss Given Default (LGD) attributable to mortgage loan default and delinquency due to weather-related natural catastrophes, by geographic region | Not disclosed, see 2024 SASB Index introduction |
| FN-MF-450a.3 | Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting                                                      | Not disclosed, see 2024 SASB Index introduction |

## Activity Metrics

| Metric      | Description                                                                                      | Response                                                                   |
|-------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| FN-MF-000.A | (1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial | See “Note 4: Loan Portfolio” section of our <a href="#">2024 Form 10-K</a> |
| FN-MF-000.B | (1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial  | Not disclosed, see 2024 SASB Index introduction                            |