2025 SASB Index

The index below is a complement to KeyCorp's 2025 Corporate Responsibility Report. The disclosures below relate to the Sustainability Accounting Standards Board 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, 2025. 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.

Topics in Multiple Sector Standards

Data Security

Metric	Description	Response
FN-CB-230a.1 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 2025 Form 10-K
FN-CB-230a.2 FN-CF-230a.3	Description of approach to identifying and addressing data security risks	See "Item 1C: Cybersecurity" section of our 2025 Form 10-K Data privacy and security

Business Ethics

Metric	Description	Response
FN-CB-510a.1 FN-AC-510a.1 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 19: Commitments, Contingent Liabilities, and Guarantees" section in our 2025 Form 10-K, for a summary of material legal proceedings
FN-CB-510a.2 FN-AC-510a.2 FN-IB-510a.2	Description of whistleblower policies and procedures	See "We Respect the Code" section of our Code of Business Conduct and Ethics

Systemic Risk Management

Metric	Description	Response
FN-CB-550a.1 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 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, stress testing, and stress capital buffer" (page 14) section of our 2025 Form 10-K See "Enhanced prudential standards and tailoring rules" (page 12) section of our 2025 Form 10-K

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 2025 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 2025 SASB Index introduction
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	For discussion, see Inclusive banking in action; number of accounts not reported, see 2025 SASB Index introduction
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	For discussion, see Inclusive banking in action; number of accounts not reported, see 2025 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	2024 TCFD Report

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 2025 Form 10-K
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	See “Note 3: Loan Portfolio” section in our 2025 Form 10-K

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 2025 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 19: Commitments, Contingent Liabilities, and Guarantees” section in our 2025 Form 10-K, 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 2025 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 2025 SASB Index introduction
FN-CF-270a.2	Approval rate for (1) credit and (2) pre-paid products for applicants	Not disclosed, see 2025 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 2025 SASB Index introduction
FN-CF-270a.4	(1) Number of customer complaints filed (2) percentage with monetary or non-monetary relief	See the CFPB's Consumer Complaint Database See 'Legal Proceedings' under "Note 19: Commitments, Contingent Liabilities, and Guarantees" section in our 2025 Form 10-K, 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 19: Commitments, Contingent Liabilities, and Guarantees" section in our 2025 Form 10-K, 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 2025 SASB Index introduction
FN-CF-000.B	Number of (1) credit card accounts and (2) prepaid debit card accounts	Not disclosed, see 2025 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 2025 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 19: Commitments, Contingent Liabilities, and Guarantees” section in our 2025 Form 10-K, for a summary of material legal proceedings
FN-AC-270a.3	Description of approach to informing customers about products and services	Wealth Management

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 2025 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 ETFs and mutual funds, a fixed income SMA, and three private equity funds. 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 2025 Form 10-K
FN-AC-000.B	Total assets under custody and supervision	Not disclosed, see 2025 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 2025 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 2025 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 2025 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 2025 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 2025 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 19: Commitments, Contingent Liabilities, and Guarantees” section in our 2025 Form 10-K, for a summary of material legal proceedings
FN-IB-510b.4	Description of approach to ensuring professional integrity, including duty of care	See our Code of Business Conduct and Ethics

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 2025 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 2025 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 2025 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 2025 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	Key only makes markets in equity securities. The following represents the number and dollar amount of buy and sell trades in fiscal year 2025 for equity market-making activities. **Type** / **Transactions** / **$ Value of Transactions** Purchases / 2,456,663 / $11,221,787,163 Sales / 2,403,302 / $11,730,555,414

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 2025 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. 127) of our 2025 Form 10-K for information on troubled debt restructuring. Financial Hardship Assistance Programs
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 19: Commitments, Contingent Liabilities, and Guarantees" section in our 2025 Form 10-K, for a summary of material legal proceedings
FN-MF-270a.4	Description of remuneration structure of mortgage loan originators	Not disclosed, see 2025 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 2025 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 19: Commitments, Contingent Liabilities, and Guarantees" section in our 2025 Form 10-K, for a summary of material legal proceedings

FN-MF-270b.3	Description of policies and procedures for ensuring non-discriminatory mortgage origination	The Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act) Community Banking: Our Approach

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 2025 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 2025 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 2025 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 3: Loan Portfolio” section of our 2025 Form 10-K
FN-MF-000.B	(1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial	Not disclosed, see 2025 SASB Index introduction