



2020 SASB Index

The index below is a complement to KeyCorp’s 2020 Environmental, Social, and Governance (ESG) 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. Unless otherwise noted, all data and descriptions apply to the entire firm and are as of or for the year ended December 31, 2020.

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.

Additional KeyCorp ESG disclosures can be found at [key.com/crreport](https://www.key.com/crreport).

Topics In Multiple Sector Standards

Data Security

SASB Metric	Description	Response
FN-CB-230a.1 FN-CF-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Refer to (“Operational and compliance risk management”) on page 86 of our 2020 Form 10-K .
FN-CB-230a.2 FN-CF-230a.3	Description of approach to identifying and addressing data security risks	Page 15 of 2021 Proxy Statement Refer to (“Operational Risk”) and (“Operational and compliance risk management”) on pages 29-31 and 86-87 of our 2020 Form 10-K Privacy and Security Pages 65-66 of 2020 ESG Report

Business Ethics

SASB 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, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 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	Pages 7-10 of Code of Business Conduct and Ethics Key makes the Ethics Helpline available to all employees. The Helpline is administered by an independent third party and is available to all employees, toll-free, 24 hours a day, seven days a week. Alternatively, employees can use the vendor’s secured third-party web-based mechanism to report online from any internet connection. The Helpline enables the reporting of a possible Code violation anonymously. The Helpline information is available to all employees in the Code of Business Conduct and Ethics and on the Ethics page of the Key intranet site.

Business Ethics Cont.

SASB Metric	Description	Response
		Issues reported to the Ethics Helpline either by phone or electronically are reported to the Ethics Office and investigated and reported according to internal policies and procedures. The Ethics Office is responsible for oversight of the Ethics Helpline and ensuring appropriate investigation and reporting.

Systemic Risk Management

SASB 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 incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Refer to (“Capital planning and stress testing”) on pages 15-17, and 68 of our 2020 Form 10-K .

Employee Diversity & Inclusion

SASB Metric	Description	Response
FN-AC-330a.1 FN-IB-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Refer to Item 1 (“Business - Human Capital”) on page 8 of our 2020 Form 10-K . Diversity, Equity, and Inclusion Leadership

Commercial Bank

Financial Inclusion & Capacity Building

SASB Metric	Description	Response
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	Not disclosed, see introduction.
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	Not disclosed, see introduction.
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Key Smart Checking® Not disclosed, see introduction.
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Financial Wellness Not disclosed, see introduction.

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

SASB Metric	Description	Response
FN-CB-410a.1	Commercial and industrial credit exposure, by industry	Refer to Figure 11 (“Commercial Loans by Industry”) on page 61 of our 2020 Form 10-K .
FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Page 54 of our 2020 ESG Report

Activity Metric

SASB 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	Refer to Figure 20 (“Breakdown of Deposits at December 31, 2020”) on page 67 of our 2020 Form 10-K .
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Refer to Note 4 (“Loan Portfolio”) on page 123 of our 2020 Form 10-K .

Consumer Finance

Customer Privacy

SASB Metric	Description	Response
FN-CF-220a.1	Number of account holders whose information is used for secondary purposes	Not disclosed, see introduction.
FN-CF-220a.2	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 Form 10-K for a summary of material legal proceedings.

Selling Practices

SASB 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 introduction.
FN-CF-270a.2	Approval rate for (1) credit and (2) pre-paid products for applicants with FICO scores above and below 660	Not disclosed, see introduction.
FN-CF-270a.3	(1) Average fees from add-on products, (2) average APR, (3) average age of accounts, (4) average number of trade lines, and (5) average annual fees for pre-paid products, for customers with FICO scores above and below 660	Not disclosed, see introduction.
FN-CF-270a.4	(1) Number of complaints filed with the Consumer Financial Protection Bureau (CFPB), (2) percentage with monetary or non-monetary relief, (3) percentage disputed by consumer, and (4) percentage that resulted in investigation by the CFPB	See the CFPB’s Consumer Complaint Database . Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 Form 10-K for a summary of material legal proceedings.

Selling Practices Cont.

SASB Metric	Description	Response
FN-CF-270a.5	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 Form 10-K for a summary of material legal proceedings.

Data Security

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

Activity Metric

SASB 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 introduction.
FN-CF-000.B	Number of (1) credit card accounts and (2) pre-paid debit card accounts	Not disclosed, see introduction.

Asset Management & Custody Activities

Transparent Information & Fair Advice for Customers

SASB Metric	Description	Response
FN-AC-270a.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Not disclosed, see 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	Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 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

SASB 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 introduction.

Environmental, Social, & Governance Factors in Investment Mgmt. & Advisory Cont.

SASB Metric	Description	Response
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	<p>Key Private Bank (KPB) sustainable investing platform covers Socially Responsible Investing; Environmental, Social and Governance (ESG); and Impact Investing. As of October 2021, Key Private Bank offers 20 ESG sustainability-oriented investment strategies (ESG investment strategies) covering both active and passive strategies, two private equity funds and an internally managed strategy, the KPB Quality ESG strategy which invests in approximately 60 US publicly traded equities that meet our ESG-related criteria. These ESG investment strategies span a wide array of asset classes including US and non-US equities and fixed income assets. In total, KPB ESG investment strategies are designed for clients who seek to align their portfolios more closely with values that focus on promoting positive, sustainable corporate ESG policies and practices.</p> <p>KPB ESG investment strategies integrate ESG factors which have historically helped reduce risk and create long-term value. The ESG investment strategies seek to provide diversified favorable risk-adjusted return outcomes while also focusing on sustainability and promoting positive corporate ESG policies and practices. The investment strategies leverage the experience of the Multi-Strategy Research (MSR) and Equity Research teams of dedicated portfolio managers, analysts, and traders.</p> <p>The MSR Team is responsible for third-party manager selection and employs a comprehensive research, due diligence and portfolio construction process to provide in-depth, ongoing, and objective guidance. As it relates to ESG, many sources are utilized in the manager search – Morningstar, The Forum for Sustainable and Responsible Investment (USSIF), and industry contacts. While the MSR Team’s research extends beyond ESG philosophy, data, integration, active ownership and reporting, the MSR Team selects managers who are fully committed to ESG investing, long-term growth potential (opportunities/risk mitigation), principle alignment and stewardship – protecting the environment, improving lives and supporting diversity. Selected managers are active owners via proxy voting, shareholder engagement, and submit periodic impact reporting.</p>
FN-AC-410a.3	Description of proxy voting and investee engagement policies and procedures	<p>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.</p>

Systemic Risk Management

SASB Metric	Description	Response
FN-AC-550a.1	Percentage of open-end fund assets under management by category of liquidity classification	Not disclosed, see introduction.
FN-AC-550a.2	Description of approach to incorporation of liquidity risk management programs into portfolio strategy and redemption risk management	Not disclosed, see introduction.
FN-AC-550a.3	Total exposure to securities financing transactions	Not disclosed, see introduction.
FN-AC-550a.4	Net exposure to written credit derivatives	Refer to Note 8 (“Derivatives and Hedging Activities - Credit Derivatives”) on pages 148-149 of our 2020 Form 10-K .

Activity Metric

SASB Metric	Description	Response
FN-AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	Refer to Item 6 (“Selected Financial Data”) on page 41 of our 2020 Form 10-K .
FN-AC-000.B	Total assets under custody and supervision	Not disclosed, see introduction.

Investment Banking & Brokerage

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

SASB 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 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 introduction.
FN-IB-410a.3	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment banking and brokerage activities	Not disclosed, see introduction.

Professional Integrity

SASB Metric	Description	Response
FN-IB-510b.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Not disclosed, see introduction.

Professional Integrity Cont.

SASB Metric	Description	Response
FN-IB-510b.2	Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party	Not disclosed, see introduction.
FN-IB-510b.3	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	Refer to Note 22 (“Commitments, Contingent Liabilities, and Guarantees”) on page 173 of our 2020 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	Not disclosed, see introduction.

Employee Incentives & Risk Taking

SASB Metric	Description	Response
FN-IB-550b.1	Percentage of total remuneration that is variable for Material Risk Takers (MRTs)	Not disclosed, see 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 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 introduction.

Activity Metric

SASB Metric	Description	Response									
FN-IB-000.A	(1) Number and (2) value of (a) underwriting, (b) advisory, and (c) securitization transactions	Not disclosed, see 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 2020 for equity market making activities. <table><thead><tr><th>Type</th><th># of Transactions</th><th>\$ Value of Transactions</th></tr></thead><tbody><tr><td>Purchases</td><td>627,171</td><td>\$15,961,648,443</td></tr><tr><td>Sales</td><td>664,550</td><td>\$15,956,549,566</td></tr></tbody></table>	Type	# of Transactions	\$ Value of Transactions	Purchases	627,171	\$15,961,648,443	Sales	664,550	\$15,956,549,566
Type	# of Transactions	\$ Value of Transactions									
Purchases	627,171	\$15,961,648,443									
Sales	664,550	\$15,956,549,566									

Mortgage Finance

Lending Practices

SASB Metric	Description	Response
FN-MF-270a.1	(1) Number and (2) value of residential mortgages of the following types: (a) Hybrid or Option Adjustable-rate Mortgages (ARM), (b) Prepayment Penalty, (c) Higher Rate, and (d) Total, by FICO scores above or below 660	Not disclosed, see introduction. Refer to (“Consumer Credit Exposure Credit Risk Profile by FICO Score and Vintage”) on page 128 of our 2020 Form 10-K for a summary of total residential mortgage exposure by FICO score.

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, by FICO scores above and below 660	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. Refer to ("TDRs") on pages 130-131 of our 2020 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	Refer to Note 22 ("Commitments, Contingent Liabilities, and Guarantees") on page 173 of our 2020 Form 10-K for a summary of material legal proceedings.
FN-MF-270a.4	Description of remuneration structure of loan originators	Not disclosed, see introduction.

Discriminatory Lending

SASB Metric	Description	Response
FN-MF-270a.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, by FICO scores above and below 660	Not disclosed, see introduction.
FN-MF-270b.2	Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	Refer to Note 22 ("Commitments, Contingent Liabilities, and Guarantees") on page 173 of our 2020 Form 10-K for a summary of material legal proceedings.
FN-MF-270b.3	Description of policies and procedures for ensuring nondiscriminatory mortgage origination	The Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act) Page 20 of 2020 ESG Report

Environmental Risk to Mortgaged Properties

SASB Metric	Description	Response
FN-MF-450a.1	(1) Number and (2) value of mortgage loans in 100-year flood zones	Not disclosed, see 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 introduction.
FN-MF-450a.3	Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting	Page 11 of 2020 Task Force on Climate-related Financial Disclosure (TCFD) Report - "Climate Change Risks & Opportunities"

Activity Metric

SASB Metric	Description	Response
FN-MF-000.A	(1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial	Refer to Note 4 ("Loan Portfolio") on page 123 of our 2020 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 introduction.

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Note Regarding Materiality

Our environmental, social, and governance (ESG) and climate-related disclosures are voluntary disclosures. The definition of materiality used for our disclosures filed with the Securities and Exchange Commission is not the same as that used for our voluntary ESG and climate-related disclosures. It should not be assumed that information included in this report is material under the definition of materiality established under federal securities laws.



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