

2022 SASB Index

The index below is a complement to KeyCorp’s 2022 Environmental, Social, and Governance (ESG) Report. The disclosures below relate to the Sustainability Accounting Standards Board¹ (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 2018-10. Unless otherwise noted, all data and descriptions apply to the entire firm and are as of or for the year ended December 31, 2022. 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 ESG disclosures can be found at [key.com/ESGreport](https://www.key.com/ESGreport).

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 involving personally identifiable information (PII), (3) number of account holders affected	Refer to (“Operational and compliance risk management”) on page 87 of our 2022 Form 10-K
FN-CB-230a.2 FN-CF-230a.3	Description of approach to identifying and addressing data security risks	Page 15 of 2023 Proxy Statement Refer to (“Operational and compliance risk management”) on page 87 of our 2022 Form 10-K Page 31-33 of 2022 KeyCorp Annual Report Privacy and Security Refer to (“Governance - Data Privacy”) Page 85-87 of 2022 KeyCorp ESG Report

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, 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 167 of our 2022 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. <i>(continue)</i>

¹ The International Financial Reporting Standards (IFRS) Foundation assumed responsibility for SASB Standards in August 2022.

	<p>Alternatively, employees can use the vendor’s secured third-party web-based mechanism to report online from any internet connection. The Ethics 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 also on the Ethics page of the Key intranet site.</p> <p>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.</p>
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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 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 17-19 of our 2022 Form 10-K Refer to ("Enhanced Prudential standards and early remediation requirements") on pages 23-24 our 2022 Form 10-K

Employee Diversity & Inclusion

Metric	Description	Response
FN-AC-330a.1 FN-IB-550a.2	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 9 of our 2022 Form 10-K Diversity, Equity, and Inclusion Leadership

Commercial Bank (CB)

Financial Inclusion & Capacity Building

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® KeyBank Hassle-Free Account® 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

Metric	Description	Response
FN-CB-410a.1	Commercial and industrial credit exposure, by industry	Refer to Figure 9 (“Commercial Loans by Industry”) on page 62 of our 2022 Form 10-K
FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Page 32 of our 2022 KeyCorp ESG 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	Refer to Figure 18 (“Breakdown of Deposits at December 31, 2022”) on page 69 of our 2022 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 117 of our 2022 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 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 167 of our 2022 Form 10-K for a summary of material legal proceedings.

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 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, (4) percentage that resulted in investigation by the CFPB	See the CFPB's Consumer Complaint Database Not disclosed, see introduction.
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 167 of our 2022 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 introduction

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 introduction
FN-CF-000.B	Number of (1) credit card accounts and (2) prepaid debit card accounts	Not disclosed, see 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 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 167 of our 2022 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 introduction.

<p>FN-AC-410a.2</p>	<p>Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies</p>	<p>Key Private Bank (KPB) sustainable investing platform covers Socially Responsible Investing; Environmental, Social and Governance (ESG); and Impact Investing. As of September 2023 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 Key Sustainable Equity Advantage (SEA) strategy which invests in approximately 50 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. 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. 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, MSCI, 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 that 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>
<p>FN-AC-410a.3</p>	<p>Description of proxy voting and investee engagement policies and procedures</p>	<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>

Activity Metrics

Metric	Description	Response
FN-AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	Refer to selected Financial Data on page 55 of our 2022 Form 10-K .
FN-AC-000.B	Total assets under custody and supervision	Not disclosed, see 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 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 and/or wealth management processes and strategies	Not disclosed, see introduction.

Professional Integrity

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.
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 167 of our 2022 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	

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 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 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 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 2022 for equity market making activities.</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Transactions</th> <th>\$ Value of Transactions</th> </tr> </thead> <tbody> <tr> <td>Purchases</td> <td>644,592</td> <td>\$18,108,123,644</td> </tr> <tr> <td>Sales</td> <td>758,831</td> <td>\$18,143,022,332</td> </tr> </tbody> </table>	Type	Transactions	\$ Value of Transactions	Purchases	644,592	\$18,108,123,644	Sales	758,831	\$18,143,022,332
Type	Transactions	\$ Value of Transactions									
Purchases	644,592	\$18,108,123,644									
Sales	758,831	\$18,143,022,332									

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) Hybrid or Option Adjustable-rate Mortgages (ARM), (b) Prepayment Penalty, (c) Higher Rate, (d) Total, by FICO scores above or below 660	<p>Not disclosed, see introduction.</p> <p>Refer to (“Consumer Credit Exposure Credit Risk Profile by FICO Score and Vintage”) on page 122 of our 2022 Form 10-K for a summary of total residential mortgage exposure by FICO score.</p>
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	<p>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 124-125 of our 2022 Form 10-K for information on troubled debt restructuring.</p> <p>Financial Hardship Assistance Programs</p>
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 167 of our 2022 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

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, 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 167 of our 2022 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 41 of our 2022 KeyCorp ESG Report
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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 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	2021 TCFD Climate Risks and Opportunities Report

Activity Metrics

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 117 of our 2022 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 and Forward-Looking Statements

Our environmental, social, and governance (ESG) and climate-related disclosures are voluntary disclosures. Our approach to these voluntary disclosures often considers disclosure recommendations and broader definitions of materiality promulgated by certain external frameworks and reporting guidelines that differ from the definition of materiality used for purposes of complying with the disclosure rules and regulations promulgated by the U.S. Securities and Exchange Commission (SEC) and applicable stock exchange listing standards. Accordingly, we may present voluntary ESG and climate-related information from a different perspective than in our SEC reports, and any use of the term "material" in the context of such information may be distinct from such term as defined for SEC reporting purposes. Any inclusion of ESG and climate-related information in this report is not an indication that the subject or information is material to Key for SEC reporting purposes.

The goals and projects described in our ESG and climate-related disclosures involve, and are based on, targets, commitments, estimates, assumptions, standards, methodologies, and currently available data, which continue to evolve and develop. As such, we cannot guarantee or promise that these goals and projects will be met or achieved as described. Additionally, our ESG and climate-related information is as of the date referenced, subject to change without notice, and may be regarded as indicative and for illustrative purposes only. This information may vary based on applicable laws, rules and regulations and may also include the use of non-financial metrics and/or other information that are subject to significant measurement uncertainties, which may include the methodology, collection and verification of data, various estimates and assumptions, and/or underlying data that is obtained from third parties, some of which cannot be independently verified.

This report may contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995, including, but not limited to, statements regarding our future performance and business and ESG and climate-related targets, goals, metrics, aspirations, strategies, and plans, which may develop and evolve over time. Forward-looking statements usually can be identified by words such as "goal," "objective," "target," "plan," "expect," "assume," "anticipate," "intend," "project," "believe," "estimate," "will," "would," "should," "could," or other words of similar meaning. Forward-looking statements reflect Key's current expectations, plans, projections, or forecasts of future events, circumstances, results, or aspirations, are not guarantees of future results or performance, and are subject to risks, uncertainties, changes in circumstances and assumptions that are difficult to predict and are often beyond our control. Given the inherent uncertainty of the estimates, assumptions, and timelines contained in this report, we may not be able to anticipate whether or the degree to which we will be able to meet or implement our targets, goals, strategies, or plans in advance. You should not place undue reliance on any forward-looking statement. If underlying assumptions prove to be inaccurate or unknown risks or uncertainties arise, actual results could vary materially from these expectations, plans, projections, or forecasts.

Factors that could cause Key's actual results or outcomes to differ from those expressed in, or implied by, any of these forward-looking statements include, among others, global socio-demographic and economic trends, legislative or regulatory changes, public policies, energy prices, technological innovations, our ability to gather and verify data regarding environmental impacts, our ability to successfully implement various initiatives throughout the company under expected time frames, engagement with clients, suppliers, investors, government officials and other stakeholders, climate-related conditions and weather events, the compliance of various third parties with our policies and procedures and legal requirements, and other unforeseen events or conditions including those factors identified in KeyCorp's Form 10-K for the year ended December 31, 2022, as well as in KeyCorp's subsequent SEC filings, which have been filed with the SEC and are available on Key's website key.com/ir and on the SEC's website www.sec.gov. Forward-looking statements speak only as of the date they are made or will be, and Key does not undertake any obligation to update the forward-looking statements to reflect new information or future events. Additionally, this report may contain statements based on hypothetical scenarios and assumptions, which may not occur or differ significantly from actual events. These statements should not necessarily be considered as being indicative of current or actual risk or forecasts of expected risk.

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