

# SUSTAINABILITY ACCOUNTING STANDARDS

## BOARD (SASB) INDEX

The index below includes SASB standards for the Financial Sector that are relevant for our business: Commercial Banks, Consumer Finance, and Mortgage Finance. Unless otherwise noted, all data and descriptions are for the year ended Dec. 31, 2024.

For additional information about Zions Bancorporation's financial performance, please refer to our quarterly and annual reports and investor presentations published on our website at [www.zionsbancorporation.com](http://www.zionsbancorporation.com).

Certain information may not be disclosed within the index below if it is not considered material; privileged or confidential; could cause a competitive disadvantage to our business if publicly disseminated; or is not currently collected in a manner wholly correlative with the related SASB metric.

Commercial Banks	
SASB Code/Metric	Response
<b>Data Security</b>	
<b>FFN-CB-230a.1</b> (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	We did not experience any material data breaches during 2024. If material data breaches had occurred, they would have been addressed in either an 8-K or discussed further in our <a href="#">2024 Form 10-K</a> .
<b>FN-CB-230a.2</b> Description of approach to identifying and addressing data security risks	See the Data Security and Customer Privacy section of our 2024 Corporate Responsibility Report; the relevant sections of our <a href="#">2024 Form 10-K</a> (pages 19, 24-25); sections of our <a href="#">Code of Business Conduct and Ethics for Employees</a> (2.3, 4.5, 5); and page 19 of our <a href="#">2025 Proxy Statement</a> .
<b>Financial Inclusion &amp; Capacity Building</b>	
<b>FN-CB-240a.1</b> (1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	The number and amount of our loans to small businesses and small farms are reported in Schedule RC-C Part II, Items 3 and 4, of our <a href="#">Call Report for Dec. 31, 2024</a> . Additional information on our Small Business Diversity Banking Program to provide additional access to capital to women-, minority-, veteran-, and LGBTQ-owned businesses, as well as other programs may be found in our Corporate Responsibility Report in the section titled "Bringing Access to Underserved Markets."
<b>FN-CB-240a.2</b> (1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	<p>The number and amount of our loans to small businesses and small farms are reported in Schedule RC-C Part II, Items 3 and 4, of our <a href="#">Call Report for Dec. 31, 2024</a>.</p> <p>The Nonaccrual and Past Due Loans discussion (pages 113-116) in the Loans, Leases, and Allowance for Credit Losses footnote of our <a href="#">2024 Form 10-K</a> presents a summary of the past due and nonaccrual status for our loan portfolio by segment and class at Dec. 31, 2024.</p>
<b>FN-CB-240a.3</b> Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Our Bank On certified OnBudget Banking and OnBudget Student Banking accounts and other products to assist clients who are developing financial literacy, on fixed incomes, previously un-banked or financially distressed are described in our Corporate Responsibility Report in the section titled "Bringing Access to Underserved Markets."
<b>FN-CB-240a.4</b> Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	See the Financial Literacy section of our Corporate Responsibility Report.
<b>Incorporation of Environmental, Social, and Governance Factors in Credit Analysis</b>	
<b>FN-CB-410a.1</b> Commercial and industrial credit exposure, by industry	See Credit Exposure by Industry or Collateral Type, in our <a href="#">Dec. 31, 2024, Basel III Regulatory Capital Disclosures Report</a> , and Commercial Lending by Industry (page 58), in the MD&A section of our <a href="#">2024 Form 10-K</a> .
<b>FN-CB-410a.2</b> Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Our approach to effectively managing ESG risks in our lending practices is described in the Environmental Risk Management section of our Corporate Responsibility Report and the Credit Risk Management section (page 56), in the MD&A section of our <a href="#">2024 Form 10-K</a> .

Business Ethics	
<b>FN-CB-510a.1</b> 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	See Legal Matters (pages 140-142) of our <a href="#">2024 Form 10-K</a> for disclosure of material legal proceedings.
<b>FN-CB-510a.2</b> Description of whistle blower policies and procedures	<p>We discuss our whistleblower protection policies and procedures in the following areas:</p> <ul style="list-style-type: none"> <li>• The Speak Up section (page 36) of our <a href="#">Code of Business Conduct &amp; Ethics</a></li> <li>• The Ethical Practices section of our Corporate Responsibility Report</li> </ul>
Systemic Risk Management	
<b>FN-IB-550a.1</b> Global Systemically Important Bank (G-SIB) score, by category	According to the Basel Committee on Banking Supervision's assessment methodology, we are not considered a G-SIB and therefore have not assessed a G-SIB score.
<b>FN-IB-550a.2</b> 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	An overview of how our stress testing influences our capital adequacy assessment is provided in the Capital Structure section (page 3), of our <a href="#">Dec. 31, 2024 Basel III Regulatory Capital Disclosures report</a> and in the Capital Planning and Stress Testing (page 10) and Capital Management (page 77) sections of our <a href="#">2024 Form 10-K</a> .
Activity Metrics	
<b>FN-CB-000.A</b> (1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	The dollar value of our consumer deposit account products is reported in Schedule RC-E of our <a href="#">Call Report for Dec. 31, 2024</a> .
<b>FN-CB-000.B</b> (1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	The distribution of our loan and lease portfolio by segment and class is reported in Loan and Lease Portfolio (page 52) in the Balance Sheet Analysis section of the MD&A, and Note 6 Loans, Leases, and Allowance for Credit Losses (page 109) of our <a href="#">2024 Form 10-K</a> .
Consumer Finance	
SASB Code/Metric	Response
Customer Privacy	
<b>FN-CF-220a.1</b> Number of account holders whose information is used for secondary purposes	We do not sell our customer data to third parties. For details on data we collect and how it is used internally, see the <a href="#">Privacy Notice</a> and <a href="#">Online Privacy Statement</a> on each of our affiliate bank websites.
<b>FN-CF-220a.2</b> Total amount of monetary losses as a result of legal proceedings associated with customer privacy	See Legal Matters (pages 140-142) of our <a href="#">2024 Form 10-K</a> for disclosure of material legal proceedings.
Data Security	
<b>FN-CF-230a.1</b> (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	We did not experience any material data breaches during 2024. If material data breaches had occurred, they would have been addressed in either an 8-K or discussed further in our <a href="#">2024 Form 10-K</a> .
<b>FN-CF-230a.2</b> Card-related fraud losses from (1) card-not present fraud and (2) card-present and other fraud	See Legal Matters (pages 140-142) of our <a href="#">2024 Form 10-K</a> for disclosure of material legal proceedings.
<b>FN-CF-230a.3</b> Description of approach to identifying and addressing data security risks	See the Data Security and Customer Privacy section of our 2024 Corporate Responsibility Report; the relevant sections of our <a href="#">2024 Form 10-K</a> (pages 19, 24-25); sections of our <a href="#">Code of Business Conduct and Ethics for Employees</a> (2.3, 4.5, 5), and page 19 of the <a href="#">2025 Proxy Statement</a> .

Selling Practices	
<b>FN-CF-270a.1</b> Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold	<p>We purposefully align our compensation philosophy for all associates with how we manage risk. We also reinforce our client centered culture through a series of checks and balances that help ensure we work in our clients' best interests. Our processes to incorporate these goals into associate compensation are discussed in the following areas:</p> <ul style="list-style-type: none"> <li>• Proposal 3: Advisory (Nonbinding) Vote Regarding 2024 Executive Compensation ("Say on Pay") (page 25) and Compensation Philosophy and Objectives (pages 30-31) of our <a href="#">2025 Proxy Statement</a></li> <li>• Fair Banking section of our 2024 Corporate Responsibility Report</li> </ul> <p>We also disclose the terms of certain incentive plans by filing those plans as exhibits to our <a href="#">2024 Form 10-K</a>.</p>
<b>FN-CF-270a.2</b> Approval rate for (1) credit and (2) pre-paid products for applicants with FICO scores above and below 660	Not disclosed — see introduction.
<b>FN-CF-270a.3</b> (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.
<b>FN-CF-270a.4</b> (1) Number of complaints filed with the Consumer Financial Protection Bureau (CFPB), (2) percentage with monetary or nonmonetary relief, (3) percentage disputed by consumer, (4) percentage that resulted in investigation by the CFPB	<p>Data on complaints filed with the CFPB can be accessed through the CFPB's Consumer Complaint Database. Our material loss contingencies related to regulatory investigations are disclosed in Note 16 (Commitments, Guarantees, Contingent Liabilities and Related Parties section) (pages 140-142) of our <a href="#">2024 Form 10-K</a>.</p> <p>Regulatory expenses are reported in the Noninterest Expense table (page 40) of our <a href="#">2024 Form 10-K</a>.</p>
<b>FN-CF-270a.5</b> Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	See Legal Matters (pages 140-142) of our <a href="#">2024 Form 10-K</a> for disclosure of material legal proceedings.
Activity Metric	
<b>FN-CF-000.A</b> Number of unique consumers with an active (1) credit card account and (2) pre-paid debit card account	Not disclosed — see introduction.
<b>FN-CF-000.B</b> Number of (1) credit card accounts and (2) pre-paid debit card accounts	The distribution of our loan and lease portfolio by segment and class is reported in the Loans, Leases, and Allowance for Credit Losses footnote (page 109) of our <a href="#">2024 Form 10-K</a> .
Mortgage	
SASB Code/Metric	Response
Lending Practices	
<b>FN-MF-270a.1</b> (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	We discuss our consumer loan portfolio in the Consumer Lending Portfolio section (pages 65-66) of the MD&A in our <a href="#">2024 Form 10-K</a> . The distribution of our loan and lease portfolio by segment and class is reported in the Loans, Leases, and Allowance for Credit Losses footnote (page 109) of our <a href="#">2024 Form 10-K</a> .
<b>FN-MF-270a.2</b> (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	We report information on (1) loan modifications, by class and modification type, (2) the amount of foreclosed residential real estate property, and (3) consumer mortgage loans collateralized by residential real estate property that are in the process of foreclosure in the Loan Modifications, Collateral-dependent Loans and Foreclosed Residential Real Estate sections (pages 121-124 of our <a href="#">2024 Form 10-K</a> ).
<b>FN-MF-270a.3</b> Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	See Legal Matters (pages 140-142) of the 2024 Form 10-K for disclosure of material legal proceedings.

<b>FN-MF-270a.4</b> Description of remuneration structure of loan originators	<p>We purposefully align our compensation philosophy for all employees with how we manage risk. We also reinforce our client-centered culture through a series of checks and balances that help ensure we work in our clients' best interests. Our processes to incorporate these goals into employee compensation are discussed in:</p> <ul style="list-style-type: none"> <li>• Proposal 3: Advisory (Nonbinding) Vote Regarding 2024 Executive Compensation ("Say on Pay") (page 25) and Compensation Philosophy and Objectives (pages 30-31) of our <a href="#">2025 Proxy Statement</a></li> <li>• Fair Banking section of our 2024 Corporate Responsibility Report</li> </ul> <p>We also disclose the terms of certain incentive plans by filing those plans as exhibits to our <a href="#">2024 Form 10-K</a>.</p>
<b>Discriminatory Lending</b>	
<b>FN-MF-270b.1</b> (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.
<b>FN-MF-270b.2</b> Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	See Legal Matters (pages 140-142) of the <a href="#">2024 Form 10-K</a> for disclosure of material legal proceedings.
<b>FN-MF-270b.3</b> Description of policies and procedures for ensuring nondiscriminatory mortgage origination	<p>The following policies ensure our nondiscriminatory mortgage origination practices monitored by our Compliance and Internal Audit departments::</p> <ul style="list-style-type: none"> <li>• Equal Credit Opportunity Act (Reg B) Policy</li> <li>• The Home Mortgage Disclosure Act (Reg C) Policy</li> <li>• Residential Lending Regulations Policy</li> <li>• Fair Banking Policy</li> </ul>
<b>Environmental Risk to Mortgaged Properties</b>	
<b>FN-MF-450a.1</b> (1) Number and (2) value of mortgage loans in 100-year flood zones	Not disclosed — see introduction.
<b>FN-MF-450a.2</b> (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.
<b>FN-MF-450a.3</b> Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting	Our approach to effectively managing environmental risks in our lending practices is described in the Environmental Risk Management section of our Corporate Responsibility Report and the Credit Risk Management section (page 56), in the MD&A section of our <a href="#">2024 Form 10-K</a> .
<b>Activity Metric</b>	
<b>FN-MF-000.A</b> (1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial	For residential mortgage information, see the Consumer Lending Portfolio section (pages 65-66) of the MD&A in our <a href="#">2024 Form 10-K</a> .
<b>FN-MF-000.B</b> (1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial	The distribution of our loan and lease portfolio by segment and class is reported in the Loans, Leases and Allowance for Credit Losses footnote (page 109) of our <a href="#">2024 Form 10-K</a> .