# KeyCorp at a glance

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## Governance

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### About this report

Key’s annual Environmental, Social, and Governance (ESG) Report describes performance and activities related to the sustainability and societal impact of our business and investments. It is a companion piece to our Annual Report to shareholders, providing all stakeholders with an update on the company’s priorities and progress as both a responsible bank and citizen.

The data reported in the 2021 ESG Report covers the period between January 1 and December 31, 2021. In instances where programs or initiatives were enhanced or introduced in the first quarter of 2022, the narrative description reflects those changes. In this document, Key reports on the ESG and corporate responsibility (CR) progress of KeyCorp, including KeyCorp’s subsidiary bank, KeyBank National Association.

Key voluntarily discloses our environmental, social, and governance efforts by using the Global Reporting Initiative (GRI), Value Reporting Foundation (formerly SASB), Task Force on Climate-Related Financial Disclosures (TCFD), and CDP frameworks, disclosing Key’s most significant areas of impact in a manner comparable to peers and industry benchmarks. View these disclosures and previous Key Corporate Responsibility Reports at key.com/esg.

For additional disclosure of Key’s ESG topics, visit the GRI content index, the community impact page, and Key’s Corporate Governance page on key.com. Feedback and questions about our corporate responsibility and ESG efforts are welcomed and can be addressed to Jennifer Eastes, Key’s Head of ESG: corporate.responsibility@key.com.
ABOUT KEY

Key’s roots trace back nearly 200 years to Albany, New York. Headquartered in Cleveland, Ohio, Key is one of the nation’s largest bank-based financial services companies, with assets of approximately $186.3 billion as of December 31, 2021.

Key provides deposit, lending, cash management, and investment services to individuals and businesses in 15 states under the name KeyBank National Association through a network of approximately 1,000 branches and over 40,000 KeyBank and Allpoint ATMs. Key also provides a broad range of sophisticated corporate and investment banking products, such as merger and acquisition advice, public and private debt and equity, and syndications and derivatives, to middle market companies in selected industries throughout the United States under the KeyBanc Capital Markets® trade name. For more information, visit key.com. KeyBank is a member of the FDIC.

Our management structure and basis of presentation is divided into two business segments, Consumer Bank and Commercial Bank.

The Consumer Bank serves individuals and small businesses throughout our 15-state branch footprint and through our national Laurel Road® digital lending business targeted toward healthcare professionals by offering a variety of deposit and investment products, personal finance and financial wellness services, lending, student loan refinancing, mortgage and home equity, credit card, treasury services, and business advisory services. In addition, wealth management and investment services are offered to assist nonprofit and high-net-worth clients with their banking, trust, portfolio management, charitable giving, and related needs.

The Commercial Bank includes our Institutional and Commercial operating segments. The Commercial operating segment is a full-service corporate bank focused principally on serving the needs of middle market clients in seven industry sectors: consumer, energy, healthcare, industrial, public sector, real estate, and technology. The Commercial operating segment is also a significant servicer of commercial mortgage loans and a significant special servicer of commercial-backed mortgage security. The Institutional operating segment delivers a broad suite of banking and capital markets products to its clients, including syndicated finance, debt and equity capital markets, commercial payments, equipment finance, commercial mortgage banking, derivatives, foreign exchange, financial advisory, and public finance.
Key Consumer Bank branches & Key Commercial Bank offices
Additional Key Commercial Bank offices

$186.3B
ASSETS

$101.9B
LOANS

$152.6B
DEPOSITS

$7.3B
REVENUE

40,000+
KEYBANK AND ALLPOINT ATMS

15
STATES

~1,000
BRANCHES

~17,000
TEAMEMATES

3.5MM
CLIENTS

Where You’ll Find Us

As of December 31, 2021
Our purpose

We help our clients and communities thrive

Our values

Teamwork
We work together to achieve shared objectives.

Respect
We value the unique talents, skills, and experience that diversity provides.

Accountability
We deliver on what we promise.

Integrity
We are open and honest in everything we do.

Leadership
We anticipate the need to act and inspire others to follow.

Our promise

For our clients
We Open Doors to help you make better, more confident financial decisions.

For our colleagues
We have a strong sense of community, where each of us has the opportunity for personal growth, to do work that matters, and work in a place where our results are rewarded.

For our communities
Through investments, lending, philanthropy, and volunteerism, we work together to support our neighbors and neighborhoods in the communities we proudly call home.

Our strategy

Build enduring relationships with targeted clients by knowing and delivering what matters most to them.

Our strategic priorities

Invest in talent
Engage a high-performing, talented, and diverse team

Organic growth
Grow profitability by acquiring and expanding targeted client relationships

Strong risk culture
Effectively manage risk and reward and maintain financial strength

Digital-first mindset
Transform the client and employee experience, operations, and infrastructure

Continuous improvement
Execute on strategic investments and improve operating efficiency
At Key, being a responsible corporate citizen is central to who we are and how we do business. We are committed to delivering value for all of our stakeholders – our clients, colleagues, communities, and shareholders.

We are proud of our strong results and track record in ESG. As such, we are pleased to share this update on the progress we have made, and importantly, the commitments we are making for the path ahead.

In 2021, we delivered strong financial results while also maintaining our deep commitment to affecting positive change in the communities we so proudly serve.

Additionally, we refined our focus on environmental opportunities, integrated ESG programs across the organization, and hired Jennifer Eastes, a highly experienced industry veteran, to lead our ESG efforts. We also expanded disclosures, including issuing our first Sustainability Accounting Standards Board (SASB) Index and Task Force on Climate-Related Financial Disclosures (TCFD) Report.

In 2021, we refreshed our ESG strategy with input from internal and external stakeholders, identifying four major priorities – climate stewardship; financial inclusion; diversity, equity, and inclusion; and data privacy and security.

**Climate stewardship**

We are deeply committed to doing our part to address climate change. We are taking deliberate actions to build a sustainable business model that manages risks, capitalizes on opportunities, and drives the transition to a low-carbon economy. As a leader in renewable energy financing in North America, Key has world-class proficiency in financing the development of renewable energy at scale, which is essential to the decarbonization of power production and electrification of transportation. Climate change is becoming further integrated in our enterprise risk management program and policies, product development, and corporate strategy. We are also advancing efforts across Key to reduce our own impact on the environment.

**Financial inclusion**

In 2021, we announced the extension and expansion of the Plan to more than $40 billion, with commitments to affordable housing, home lending, and philanthropy in low- to moderate-income (LMI) communities as well as renewable energy financing and specific commitments to advance economic, social, and racial equity.

Financial inclusion remains a priority for Key. In 2021, we partnered with the Financial Health Network to help us identify more opportunities to support equitable financial health outcomes. We also introduced a new, senior role focused on increasing banking access for LMI communities.
We received our 10th consecutive “Outstanding” rating from the Office of the Comptroller of the Currency for meeting or exceeding the terms of the Community Reinvestment Act – one of the few banks to reach this milestone. It is a testament to our track record of fairness, access, and equity for every client we serve.

Diversity, equity, and inclusion

We are proud of our award-winning culture that champions diversity, equity, and inclusion – inside and outside our company. Our diversity, equity, and inclusion strategy is focused on three pillars: a diverse workforce; an inclusive workplace; and equity, fairness, and access in our marketplaces for the clients, the suppliers, and the communities we serve.

In 2021, we publicly committed to increasing people of color (POC) representation in our senior leadership ranks by 25% by 2025, and 50% by 2030. I am pleased to report that as of year-end 2021, we are ahead of pace to achieve our goal.

In addition to our representation goal, we launched new training and programs focused on inclusion and allyship. We continue to improve programs that cultivate career paths, leadership skills, and mentoring, as well as increasing spend with diverse suppliers and investing in our relationships with diverse communities.

In 2022, we welcomed a new Chief Diversity, Equity, and Inclusion (DE&I) Officer, Helena Haynes-Carter. Her passion and expertise will help us further advance our long-standing commitment to DE&I.

While we recognize we have more to do, earning our 12th “Top 50” recognition from DiversityInc – and the 23rd spot in their global ranking – is a confirmation of all we have accomplished together.

Data privacy and security

As a digitally progressive bank, we are able to work more efficiently while delivering great experiences for our clients and teammates. Our investments in digital have also helped us to reduce our environmental impact and continuously enhance our information security and privacy programs, policies, and processes.

Keeping the personal and financial information of our clients and teammates protected and secure is a critical priority for our team. Strong data safeguards and controls, in conjunction with continuous monitoring of the threat landscape, helps protect the security and privacy of the information entrusted to Key. As the information security threat landscape continues to evolve, we will remain focused on our ability to align with industry standards to protect information and manage any threats or incidents as they arise.

In conclusion

Our 2021 ESG Report provides details about our governance policies and practices, the steps we are taking to become even more environmentally and socially responsible, and the significant impacts of our efforts.

Our substantive progress is made possible by the expertise, dedication, and commitment of our teammates – 17,000 strong. Additionally, we have a diverse and experienced Board of Directors who have guided both our performance and our path forward. Together, we are focused on our collective purpose: to help our clients, colleagues, and communities thrive while delivering sound, profitable growth for our shareholders.

We look forward to continuing an open and transparent dialogue with you and all of our stakeholders as we work to address needs in – and to create shared value with – our communities, our country, and our world.

Sincerely,

Chris Gorman
Chairman and Chief Executive Officer
April 2022
To build enduring, trusted relationships with our stakeholders, we are constantly refining our listening and communication strategies. Engaging with all stakeholders is an ongoing priority, and in 2021, we dedicated extra attention to our community listening efforts. Key’s National Advisory Council, Regional Advisory Councils, and community leaders from across our footprint were instrumental in providing feedback to inform our decisions about future community investments via our expanded National Community Benefits Plan. Several major themes emerged from this work, including the desire to intensify our local impact, provide even more community leadership, and develop deeper, more active partnerships with community organizations.

**Ways we engaged**

### Clients

- Kept most branches open throughout the pandemic
- Deepened our commitment to client centricity by investing in a new, world-class, client experience measurement platform, empowering our front line with real-time client feedback, improving our ability to identify themes in client feedback, and enabling us to launch a comprehensive process to follow up with clients who have responded to a survey
- Redesigned all client surveys to gather more meaningful feedback and advanced our analytic capabilities to garner deeper, more actionable insights
- Launched a personalized outreach program for clients who expressed dissatisfaction with a recent experience
- Introduced a new software to better collect and understand digital user experience data

### Communities

- Held listening sessions with members of our National Advisory and Regional Advisory Councils, in addition to partnering with the National Community Reinvestment Coalition (NCRC), to host seven listening sessions throughout our footprint, reaching more than 200 community organizations. The listening sessions covered a range of topics including Key’s products, services, and how we engage with communities
- Conducted formal community needs assessments in select markets to inform our commitments related to the Community Reinvestment Act (CRA)
Teammates

- Prioritized employee health and safety by instituting daily health screenings, providing up to four hours of paid time off for COVID-19 vaccination appointments, and expanding mental health programs
- Launched a new workspace reservation system to enable social distancing as teammates returned to the office after pandemic-related closures
- Promoted inclusion through our employee benefits program by offering highly valued benefits to targeted demographics to help employees feel supported on every level
- Our Black Leader Forum provided an opportunity for Black leaders to share their experiences, perspectives, and feedback with the CEO and other executives.
- Modernized our Voice of the Employee (VoE) Forum platform by providing a more intuitive, engaging experience for our employees to innovate, co-create, and crowdsource solutions for areas of opportunity
- Enhanced our reward and recognition program to provide more personalized rewards and improved our peer-to-peer recognition tool, Key Appreciation
- Held regular town hall meetings, during which teammates had an opportunity to hear directly from executives and ask questions

Suppliers

- Continued to build strategic relationships with Tier 1 suppliers that are certified as diverse
- Encouraged Key’s nondiverse suppliers to utilize diverse-owned businesses and report their diverse spend to us (Tier II reporting)
- Participated in regional and national procurement forums to learn and share best practices related to supplier diversity
- Enhanced supplier RFP questions and Key’s Supplier Code of Conduct in support of Key’s ESG strategy

Shareholders

- Members of the Executive leadership team presented at eight industry conferences. The team held meetings with the majority of equity analysts covering Key, as well as over 200 institutional investors.
- Conducted ESG-focused discussions with our largest shareholders, with representation from our Board of Directors
- Hosted Investor Day in March 2022, during which we reviewed our business strategy and outlook, and reaffirmed our commitment to deliver value for all stakeholders
- Regularly communicated with the investment community, including analysts, shareholders, and rating agencies

Regulators and public officials

- Engaged on relevant state and federal policy issues such as enhanced access to affordable housing, continued assistance for individuals and small businesses during COVID recovery, and the financing of student loans
- Shared updates with regulators, public officials, and agencies on ESG topics, such as CRA and climate change
- Participated in the Office of the Comptroller of the Currency’s (OCC) Project REACh (Roundtable for Economic Access and Change) with the objective of removing structural barriers to financial inclusion
- Participated in targeted exams and compliance reviews
ESG STRATEGY
AND MANAGEMENT

ESG strategy and focus assessment

Key is committed to addressing the ESG topics that are most relevant to our business and our stakeholders. We periodically adjust our ESG approach to remain current with stakeholder expectations, ESG trends, and our business strategy. In 2021, we conducted an ESG focus assessment to identify and align on our ESG priorities, refresh our strategy, and drive action. The process considered inputs from internal and external stakeholders to ensure a variety of perspectives were reflected in our focus areas.

Working with a leading global consultant, we identified an initial set of 30 topics based on sustainability reporting frameworks and ESG rating and ranking criteria. That list was then refined to 11 topics for review and validation across the enterprise. Our leadership team was engaged through a series of internal interviews to prioritize the topics based on their importance to our external stakeholders and their influence on our business success. From the list of 11, four priorities were identified as differentiators for Key.

We remain steadfast in managing the resulting risks and opportunities associated with each of these focus areas and will further evaluate the adequacy of our governance, policies, commitments, goals, projects, and programs associated with each throughout the course of 2022.

ESG management and oversight

Management shares responsibility in setting and executing corporate strategies that support ESG. While ESG oversight is spearheaded by the Director of Corporate Center, the entire Executive Leadership team (ELT) (which includes the CEO) shares accountability. Managing the company’s reputation requires monitoring and addressing ESG topics. Therefore, ESG topics are frequently discussed in leadership meetings. ESG factors are also managed by the Board of Directors and are a particular area of focus for Key’s Nominating and Corporate Governance Committee.

In 2021, Key established the Corporate Responsibility (CR) Council to monitor emerging ESG trends, identify strategic ESG opportunities for the company, oversee ESG disclosures, and share knowledge. The cross-functional council is comprised of senior leaders from across the enterprise including Corporate Responsibility, Risk, Legal, Finance, KeyBanc Capital Markets, Key Equipment Finance®, and Consumer Bank, among others. As appropriate, representatives from the CR Council escalate ESG matters to the ELT, and the Enterprise Risk Management Committee.

Key’s ESG priorities

- Diversity, equity, and inclusion
- Financial inclusion
- Climate stewardship
- Data privacy and security
2021 ESG HIGHLIGHTS

Financial highlights

$2.6B NET INCOME

$2.62 DILUTED EARNINGS per share

19.4% RETURN on average tangible common equity

Common Equity Tier 1

Communities

- $6.9 billion invested in communities through our National Community Benefits Plan
- $4.1 billion investments in affordable housing
- $2.0 billion in mortgage lending to LMI individuals or in LMI communities
- $832.9 million in small business lending in LMI communities
- $33.8 million in transformational philanthropic investments, including $2.1 million in charitable contributions made through Key employee programs
- $832.9 million in small business lending in LMI communities

Diversity, equity, and inclusion

- Board diversity
  - 46% diverse
  - 31% women
  - 23% racially or ethnically diverse
- On track to deliver 25% increase in POC representation by 2025 and 50% increase by 2030
- 8% of qualified spend with diverse suppliers
- Hosted nine speaker sessions on social justice and racial equity for teammates
- 97% of employees completed our Building Bridges Diversity, Equity, and Inclusion training

Teammates

- $12.5 million invested in our teammates’ development
- 580,000 hours of formal learning programs and courses
- 58% of our teammates belong to at least one of our 12 employee resource groups

Sustainable operations

- $13.5 billion committed to renewable energy projects since 2007. Since inception, facilitated $52.5 billion of financings in the bank debt market.
- ~$2.4 billion raised through green, social, and sustainable bond offerings in 2021
- $403.6 million in residential solar loans in 2021
- Reduced internal and external printing by 50 million pages
- 30.8% reduction in scope 1 and 2 GHG emissions compared to our 2016 baseline
- For the second year in a row, named a ‘2021 Supplier Engagement Leader’ by CDP

Recognition

- 12X Top 50 Companies for Diversity by DiversityInc
- 8X Community Minded Companies by Civic 50

As of December 31, 2021

1 Net income and earnings per share from continuing operations attributable to Key Common Shareholders
2 KeyBanc Capital Markets as lead arranger
ENVIRONMENT

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Key is committed to expanding our strong legacy of climate stewardship – taking bold actions to reduce greenhouse gas emissions, become carbon neutral in our operations, and support environmental equity. Our responsible business practices and investments are making a measurable impact on reducing our environmental footprint and building more sustainable communities. We aim to deepen our impact by activating those around us, encouraging teammates, suppliers, and other stakeholders to practice more sustainable behaviors. We monitor risks related to climate change and are in the process of adapting our operational practices to reduce our environmental footprint.
With each wildfire, flood, and extreme storm, it is increasingly clear that our planet is under stress. Climate change is and will continue to affect everyone, but LMI and minority communities are disproportionately impacted. Through our climate action, Key seeks to identify ways in which we can meaningfully address these disparities. Given the devastating impacts related to climate change, investors, clients, regulators, public officials, and employees expect the financial services industry to drive climate action. Key is committed to leveraging our expertise, relationships, market influence, and resources to help address the pressing challenge of climate change. For this reason, we are expanding our climate commitments to further minimize the environmental impact of our operations, provide more solutions to our clients, and support environmental equity.

**Key commits to the following actions:**

**Sustainable finance**
Finance or facilitate $38 billion to address climate change and support green initiatives by year-end 2026.

**Carbon neutral**
Achieve carbon neutral operations across our scope 1 direct emissions and scope 2 indirect emissions by year-end 2030.

**Financed emissions**
Join the Partnership for Carbon Accounting Financials (PCAF) and complete the necessary measurement and evaluation of scope 3 financed emissions.

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**Task Force on Climate-Related Financial Disclosures (TCFD)**

We recognize the importance of providing updates on our progress to manage the risks and opportunities associated with climate change. In November 2021, we published our first TCFD Report, which should be reviewed as a companion piece to this ESG Report. Informed by TCFD’s recommendations, the report outlines our approach to managing climate-related risks and opportunities in the areas of governance, strategy, risk management, and metrics and targets.

Since the publication of our first TCFD Report, we’ve made considerable progress, including articulating enhanced climate commitments; identifying and evaluating opportunities to formally integrate climate risk into our enterprise risk framework; and embedding climate considerations into our enterprise strategy. Our customer-first mindset will further enable Key to support our clients in the transition to a green economy.
SUPPORTING CLIENTS WITH SUSTAINABLE INVESTMENTS

Environmental sustainability is an important consideration in the investments we make in our businesses and the products and services we offer. Our actions help support a brighter future for the world around us. Renewable energy, green buildings, energy efficiency, and high-efficiency vehicles are just some of the important investment areas we support as our clients seek to reduce environmental impacts and enhance energy efficiency.

Green, social, and sustainable bonds

The issuance of green, social, and sustainable (GSS) bonds has accelerated rapidly and constitutes a growing percentage of the overall bond market. KeyBanc Capital Markets (KBCM) sees continued growth of GSS bond issuance as investor demand for the GSS label increases and more clients turn to these instruments to highlight their sustainability plans.

In 2021, KBCM’s Debt Capital Markets (DCM) team participated in 19 GSS bond offerings, raising nearly $1.4 billion\(^1\) of proceeds to support environmental and social benefits. DCM led nine GSS offerings, including a sole lead agent role in the energy project financing for California State University’s Fresno campus, which represented the first sustainability-linked U.S. private placement. KBCM’s Public Finance (PF) team participated in 48 GSS bond offerings, totaling more than $1 billion.\(^1\) PF acted as the lead agent on 41 of those offerings, including the first social bond issuance by the Cuyahoga Metropolitan Housing Authority in Cleveland, Ohio. KBCM’s GSS bond activity in 2021 exceeded that of 2020, with DCM seeing growth of ESG capital raising of 35% year-over-year (YoY) by volume and Public Finance seeing YoY growth of 80%. We also took on more meaningful roles in ESG financing transactions for both new and existing clients as evidenced by our lead agent roles as noted above.

\(^1\)Reported total represents KBCM’s share of third-party designated, company designated, and self-designated GSS transactions.
Renewable energy investments

Key supports our clients – from commercial customers to individual homeowners – in their transition to a low-carbon economy through our market-leading position in Renewable Energy Finance. We provide tailored advice and solutions to advance investments in renewable energy. Within the energy sector, Key’s single largest aggregate outstanding loan exposure is to renewables.

Energy-Related Commercial Portfolio

Outstandings as of December 31, 2021

- renewable energy: $3,970.4MM
- power utilities: $1,819.8MM
- oil & gas: $1,586.5MM
- coal: $65.6MM

This chart reflects commercial loans and leases only as of 12/31/2021, in millions.

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1Credit risk industry reporting is done on an ‘as-is’ basis and reflects most current North American Industrial Classification System (NAICS) industry code assigned, which may vary from NAICS code assigned in historical reporting. 2“Coal” includes coal and support activities sub-industries of metals and mining. 3“Oil & Gas” includes the entire oil and gas industry. 4“Power Utilities” includes renewables, water and sewer, and other waste disposal from the utilities industry. 5“Renewables” includes non-carbon power NAICS codes (e.g., solar, wind, hydro, nuclear, and biomass).
KeyBanc Capital Markets

KeyBanc Capital Markets (KBCM) is a leader in renewable energy investments in the U.S. and provides services to clean technology firms in the power generation, smart grid, energy management, and pollution control sectors. In 2021, KBCM continued to invest in its renewable investment banking team, doubling in size while enhancing its advisory and capital markets capabilities.

From 2018 through 2021, we ranked as the number #1 North American renewable energy project finance lender in terms of both the number and dollar volume of deals executed. ¹ For deals executed in 2021, we ranked #2 in both the number and dollar volume of deals executed.

At year-end 2021, Key had $6.5 billion committed to renewable energy projects, representing a cumulative capacity of 42.9 GW, a 7.0 GW increase compared to 2020. Key has committed more than $13.5 billion to renewable energy since the inception of the alternative energy team in 2007. These direct commitments by Key have helped to facilitate $52.5 billion of financings in the bank debt market for renewables.

A major highlight of the past year was KCBM’s role in one of the largest financing deals for a utility-scale stand-alone battery storage project. In October 2021, we successfully financed Plus Power’s $218.9 million Kapolei Energy Storage project. Kapolei consists of a stand-alone battery energy storage system with a capacity of 185 megawatts / 565 megawatt hours, which once complete, will be the fourth-largest battery storage project in the world. The project is located on Oahu, Hawaii, and is expected to be commercially operational by the fourth quarter of 2022. Once operational, the project will replace AES’s coal plant, the last remaining coal-fired generation in Hawaii, supporting the state’s goal of shifting from fossil fuels to 100% renewable energy generation.

KBCM’s position in league tables for renewable energy finance reinforces the degree to which Key has established a leadership position in renewable energy for the past several years.

<table>
<thead>
<tr>
<th>Rank</th>
<th>Mandated Lead Arranger</th>
<th>$MM</th>
<th>Deals</th>
<th>% Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>KeyBanc Capital Markets</td>
<td>$10,318</td>
<td>159</td>
<td>9.1%</td>
</tr>
<tr>
<td>2</td>
<td>Mitsubishi UFJ Financial Group</td>
<td>$9,036</td>
<td>115</td>
<td>7.9%</td>
</tr>
<tr>
<td>3</td>
<td>Santander</td>
<td>$6,773</td>
<td>62</td>
<td>5.9%</td>
</tr>
<tr>
<td>4</td>
<td>CIBC</td>
<td>$4,226</td>
<td>42</td>
<td>3.7%</td>
</tr>
<tr>
<td>5</td>
<td>Sumitomo Mitsui Financial Group</td>
<td>$3,000</td>
<td>33</td>
<td>2.6%</td>
</tr>
</tbody>
</table>

¹Based on data compiled by Dealogic for North American wind, solar, and battery storage deals.
Key Equipment Finance

Key Equipment Finance (KEF) provides tailored equipment and lease financing solutions for both renewable generation and energy efficiency projects. KEF’s Clean Energy team helps its clients develop an integrated approach to achieve their sustainability goals. In 2021, KEF financed $410 million of new energy efficiency, fuel cell, and solar projects, bringing the group's cumulative financing of 490 transactions totaling more than $1.6 billion since it was established in 2012.

KEF Clean Energy continues to expand the financing of hydrogen powered distributed generation projects, adding fuel cell powered materials handling vehicles to the portfolio. We first entered the market in 2015, as an early investor in hydrogen-based power generation, fueling stations, and materials handling. Since then, we have provided funding for more than $400 million in hydrogen-fueled assets.

Residential Solar Lending at Key

Since launching the Residential Solar Lending business in 2019, Key has funded $690 million of residential solar loans. In 2021, we provided 11,207 loans totaling nearly $404 million to help clients manage the cost of a new solar panel system. The solar loan financing option allows clients to spread the cost of a new system over time with a loan specifically designed for solar power users.
Reducing the environmental impact associated with our real estate footprint is an ongoing effort, and maintaining and operating efficient workspaces remains a priority. Key’s Corporate Real Estate Solutions team leads many of our responsible operations activities, making significant facility and operational improvements by applying green building principles and investing in energy management systems and equipment upgrades across our real estate portfolio.

Managing greenhouse gas emissions

Key’s multiyear effort to optimize operations is having positive environmental impacts. Reducing the greenhouse gas emissions associated with our operations is a major priority, demonstrated by our increased ambition to achieve carbon neutrality for scope 1 and 2 emissions by 2030. At the same time as we strive for carbon neutrality, we recognize that continuing to reduce emissions on an absolute basis is critical for the planet; for this reason, we will continue to monitor progress toward our previously announced scope 1 and 2 emission reduction goals. Together, these goals will ensure that we not only achieve carbon neutrality, but that we also continue to reduce our emissions overall.

Through our energy efficiency initiatives, strategic site consolidations, other capital project optimization, and behavior changes, we’ve reduced scope 1 and 2 emissions by 31% and energy consumption by 23% since 2016.

Our carbon commitments and progress, Key is committed to:

- Achieve carbon neutral operations across our scope 1 direct emissions and scope 2 indirect emissions, by year-end 2030
  - we are 31% of the way there.
- 40% reduction in scope 1 & 2 emissions by 2030
  - we are 77% of the way there.
- 80% reduction in scope 1 & 2 emissions by 2050
  - we are 39% of the way there.

Scope 1 and 2 Market Based GHG Emissions (MT CO2e)

<table>
<thead>
<tr>
<th>Year</th>
<th>Baseline</th>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>65,734</td>
<td>39,441</td>
</tr>
<tr>
<td>2019</td>
<td>62,839</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>48,703</td>
<td></td>
</tr>
<tr>
<td>2021</td>
<td>45,485</td>
<td></td>
</tr>
<tr>
<td>2030</td>
<td>39,441</td>
<td></td>
</tr>
</tbody>
</table>

Energy Consumption (GJ)

<table>
<thead>
<tr>
<th>Year</th>
<th>Direct Energy</th>
<th>Indirect Energy</th>
<th>Total Energy Consumed</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>57,439</td>
<td>166,834</td>
<td>166,834</td>
</tr>
<tr>
<td>2020</td>
<td>57,439</td>
<td>166,834</td>
<td>166,834</td>
</tr>
<tr>
<td>2021</td>
<td>57,439</td>
<td>166,834</td>
<td>166,834</td>
</tr>
</tbody>
</table>

'This refers to the Greenhouse Gas Protocol for scope definitions. In our prior year disclosure, the location-based 2016 scope 1 and 2 emissions totals were referenced as the baseline for our respective targets. We have shifted that reference point to be that of market-based 2016 scope 1 and 2 emissions. By leveraging a market-based methodology, it will allow the retirement of renewable energy sources in order to achieve our goals, which would otherwise not be possible using a location-based methodology.
Waste management

Along with adhering to green building principles, Key has implemented a robust waste management program. We prioritize opportunities to reduce and divert waste to contribute to our sustainability and efficiency goals. For example, as we close or move branch locations, there is a significant amount of banking equipment, including ATMs, cameras, cable, and wiring, that we recycle, reuse, or reallocate to avoid the landfill. In 2021, we optimized the physical footprint of our headquarters in Cleveland, Ohio, resulting in a surplus of furniture. Rather than disposing of the furniture, Key coordinated with more than a dozen nonprofits in the Greater Cleveland area to donate 23 tons of used office furniture – with a replacement value of approximately $330,000. Combined, Key’s waste diversion efforts kept more than 3,000 metric tons of waste out of landfills in 2021.

### 2021 Solid Waste Diverted and Landfilled (metric tons)

<table>
<thead>
<tr>
<th>Waste Type</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recycling – Bank Equipment</td>
<td>145.1</td>
</tr>
<tr>
<td>Recycling – Carpet</td>
<td>9.2</td>
</tr>
<tr>
<td>Recycling – E-Waste</td>
<td>86.7</td>
</tr>
<tr>
<td>Recycling – Furniture</td>
<td>24.2</td>
</tr>
<tr>
<td>Recycling – Lighting Products</td>
<td>1.1</td>
</tr>
<tr>
<td>Recycling – Mixed</td>
<td>1.3</td>
</tr>
<tr>
<td>Recycling – Paper</td>
<td>12.3</td>
</tr>
<tr>
<td>Recycling – Shredded Paper</td>
<td>2,539.2</td>
</tr>
<tr>
<td>Recycling – Solid Waste</td>
<td>246.9</td>
</tr>
<tr>
<td><strong>Total Recycling</strong></td>
<td><strong>3,066.0</strong></td>
</tr>
<tr>
<td><strong>Total Landfilled</strong></td>
<td><strong>2,184.9</strong></td>
</tr>
<tr>
<td><strong>Total Waste</strong></td>
<td><strong>5,250.9</strong></td>
</tr>
<tr>
<td><strong>Diversion Rate</strong></td>
<td><strong>58%</strong></td>
</tr>
</tbody>
</table>
Paper reduction strategy

Required disclosures, monthly statements, signature pages, and more create a substantial amount of paper consumption. Key’s digital strategy is changing our use of paper. Key’s paper reduction strategy, which launched in late 2020, has reduced the use of paper across the enterprise. In 2021, Key reduced internal and external printing by 50 million pages, reducing our impact on natural resources (shown below) and saving $3.4 million.

While there was an expected decline in paper usage during 2020 due to more teammates working from home, we also initiated a number of projects in 2021 to encourage sustainable printing and mailing practices. For example, we updated rules to reduce the volume of paper teammates were able to print inside the office, cutting the number of sheets printed by more than 39 million when compared with 2019 and saving nearly $1 million in paper costs. We redesigned demand deposit account (DDA) statements to decrease the average statement length by one page, saving approximately 4.75 million sheets of paper. We’re also encouraging clients to select paperless options, which reduced the number of mailed statements by 1.4 million in 2021, or roughly 4.2 million sheets of paper.

Beyond identifying ways to reduce our own paper usage, we support our clients in reducing their paper consumption as well. KeyBanc Capital Markets adopted the use of DocuSign in 2021, enabling clients to digitally sign and send back agreements instead of printing, scanning, and emailing them.

As Key and more of our clients embrace a digital-first strategy, we expect the downstream impact on paper reduction to grow.

The Environmental Impact of Key’s Paper Reduction¹

<table>
<thead>
<tr>
<th>1,200</th>
<th>2,695</th>
</tr>
</thead>
<tbody>
<tr>
<td>TONS OF WOOD</td>
<td>TONS OF GREENHOUSE GASES</td>
</tr>
<tr>
<td>made from 7,180 trees</td>
<td>equivalent to emissions from 490 cars each year</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2,242,000</th>
<th>6,420,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>KWH OF ENERGY</td>
<td>GALLONS OF WATER</td>
</tr>
<tr>
<td>enough to power 265 homes each year</td>
<td>enough to run 160,500 washing machine cycles</td>
</tr>
</tbody>
</table>

¹Estimates calculated using Paper Calculator, Environmental Paper Network. Comparison is based on prepandemic printing levels from 2019.
SUPPLY CHAIN SUSTAINABILITY

Third-party suppliers are important partners in advancing Key’s ESG strategy. We are deliberate in integrating ESG into supply chain relationships.

In 2021, Key formed a team of procurement and business professionals to enhance our Supplier Code of Conduct and update our request-for-proposal (RFP) questionnaire to more intentionally consider ESG, along with diversity, equity, and inclusion (DE&I) topics, during the third-party evaluation and selection process.

Key’s Supplier Code of Conduct, which has been in place since 2016, was updated to reflect our current expectations on environmental practices, workplace health and safety, ethics, and DE&I. We put greater emphasis on demonstrating a commitment to responsible environmental stewardship, including bringing forward ideas for reducing the environmental impact of the products and services provided to Key. We also included language to encourage third parties to assess environmental impacts and sustainability within their supply chains, including tracking and reporting issues such as greenhouse gas emissions, carbon footprint, and waste reduction. To learn more about Key’s Supplier Code of Conduct, visit the Suppliers Standards for Doing Business page on key.com.

Suppliers are encouraged to hold us accountable for our actions as well. The Supplier Code of Conduct provides clear guidance for reporting any suspected or known violation of Key’s Code of Business Conduct and Ethics through an anonymous ethics helpline.
ENVIRONMENTAL RISK MANAGEMENT

Our clients are exposed to a myriad of risks related to climate change, natural disasters, and unexpected events. The increase in severe weather events, along with the pandemic, underscore the need for heightened monitoring. We have an enhanced credit risk data mart, which includes geographic mapping of client exposures and the ability to identify subindustry exposure by NAICS code. As a result, we are able to monitor restricted high-carbon contributors, such as our coal-related clients; clients prone to weather-related events and climate changes such as agriculture; and support targeted investment in clean technologies, such as solar and wind. The bank has teams that specialize in underwriting by industry, enabling us to focus specific resources to maximize our use of financial products and services to impact climate change activities, and to better assess and better react to the impacts of expected climate-related regulatory and legislative changes. Further, we have a centralized process to quickly identify and analyze potential losses when natural disasters occur.

In conjunction with Key’s broader development of an ESG framework, the credit process will be augmented to include focus on climate risks within our underwriting process, effectively assessing and establishing a climate risk score for our at-risk portfolio and supporting climate scenario development as we enhance our ability to quantify climate risk. We have implemented some climate-related changes already. In instances where an environmentally sensitive credit request is identified, overall ESG plans of the applicant are reviewed, and where appropriate, affirmative covenants or pricing incentives are tied to specific environmental plans. Although not currently mandated, this practice will be included in our climate risk-related efforts over the coming months. Key is also leveraging available credit capacity to support green transformations for our existing clients and reviewing similar efforts with new clients as well. In keeping with our balanced risk/return mindset, we will utilize our climate expertise to not only manage risk, but to bolster and enhance our ability to take advantage of new and expanding revenue opportunities.
# ENERGY CONSUMPTION AND GREENHOUSE GAS DATA

## Normalizing Factors

<table>
<thead>
<tr>
<th>Scope/Source</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Active Sites(^2)</td>
<td>1,263</td>
<td>1,185</td>
<td>1,228</td>
</tr>
<tr>
<td>Teammate Headcount (full year average)</td>
<td>17,045</td>
<td>16,826</td>
<td>16,974</td>
</tr>
<tr>
<td>Consolidated Total Assets ($ billion)</td>
<td>$145.0</td>
<td>$170.3</td>
<td>$186.3</td>
</tr>
</tbody>
</table>

\(^1\)GHG data has been verified by Apex – scope 1 and scope 2 emissions as well as the scope 3 categories business travel, fuel- and energy-related activities, waste generated in operations, employee commuting, and upstream leased assets. \(^2\)Total Active Sites represents the number of sites with scope 1 and 2 energy data in Key’s operational control. This varies from the number of branches and ATMs listed in KeyCorp’s 10-K as some sites are leased or are not supported by direct billing and are therefore represented in Key’s scope 3 upstream leased assets emission estimation. \(^3\)100% of the Electric Power consumed above is derived from the grid.

## Energy Consumption (MWh)

<table>
<thead>
<tr>
<th>Scope/Source</th>
<th>2016 Baseline</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>%Δ from 2020</th>
<th>%Δ from 2016 Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Direct Energy</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas</td>
<td>61,283</td>
<td>59,564</td>
<td>50,987</td>
<td>50,147</td>
<td>-1.6%</td>
<td>-18.2%</td>
</tr>
<tr>
<td>Diesel – Stationary</td>
<td>409</td>
<td>276</td>
<td>254</td>
<td>228</td>
<td>-10.2%</td>
<td>-44.2%</td>
</tr>
<tr>
<td>Propane</td>
<td>1,669</td>
<td>2,087</td>
<td>1,581</td>
<td>1,433</td>
<td>-9.4%</td>
<td>-14.1%</td>
</tr>
<tr>
<td>Number 2 Fuel Oil</td>
<td>3,782</td>
<td>4,456</td>
<td>3,571</td>
<td>2,949</td>
<td>-17.4%</td>
<td>-22.0%</td>
</tr>
<tr>
<td>Jet Fuel (Jet A or A-1)</td>
<td>4,808</td>
<td>3,493</td>
<td>1,036</td>
<td>2,177</td>
<td>110.1%</td>
<td>-54.7%</td>
</tr>
<tr>
<td><strong>Indirect Energy</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electric Power(^3)</td>
<td>139,419</td>
<td>116,947</td>
<td>107,885</td>
<td>106,422</td>
<td>-1.4%</td>
<td>-23.7%</td>
</tr>
<tr>
<td>Renewable Energy</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2,421</td>
<td>-</td>
<td>100.0%</td>
</tr>
<tr>
<td>Purchased Steam</td>
<td>132</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-100.0%</td>
</tr>
<tr>
<td><strong>Total Direct &amp; Indirect Energy</strong></td>
<td>211,502</td>
<td>186,823</td>
<td>165,314</td>
<td>163,357</td>
<td>-1.2%</td>
<td>-22.8%</td>
</tr>
</tbody>
</table>
## Greenhouse Gas Emissions (MT CO2e)

<table>
<thead>
<tr>
<th>Scope/Source</th>
<th>2016 Baseline</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>%Δ from 2020</th>
<th>%Δ from 2016 Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope 1</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas</td>
<td>11,110</td>
<td>10,795</td>
<td>9,241</td>
<td>9,088</td>
<td>-1.6%</td>
<td>-18.2%</td>
</tr>
<tr>
<td>Diesel – Stationary</td>
<td>104</td>
<td>70</td>
<td>64</td>
<td>58</td>
<td>-10.1%</td>
<td>-44.2%</td>
</tr>
<tr>
<td>Propane</td>
<td>360</td>
<td>449</td>
<td>341</td>
<td>309</td>
<td>-9.4%</td>
<td>-14.2%</td>
</tr>
<tr>
<td>Number 2 Fuel Oil</td>
<td>958</td>
<td>1,128</td>
<td>904</td>
<td>747</td>
<td>-17.4%</td>
<td>-22.0%</td>
</tr>
<tr>
<td>Jet Fuel (Jet A or A-1)</td>
<td>1,189</td>
<td>864</td>
<td>256</td>
<td>538</td>
<td>110.1%</td>
<td>-54.7%</td>
</tr>
<tr>
<td><strong>Scope 2 – Location Based</strong></td>
<td>49,820</td>
<td>41,834</td>
<td>37,177</td>
<td>36,402</td>
<td>-2.1%</td>
<td>-26.9%</td>
</tr>
<tr>
<td>Electric Power</td>
<td>49,782</td>
<td>41,834</td>
<td>37,177</td>
<td>36,402</td>
<td>-2.1%</td>
<td>-26.9%</td>
</tr>
<tr>
<td>Purchased Steam</td>
<td>37</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Scope 2 – Market Based</strong></td>
<td>52,015</td>
<td>49,532</td>
<td>37,897</td>
<td>34,745</td>
<td>-8.3%</td>
<td>-33.2%</td>
</tr>
<tr>
<td>Electric Power</td>
<td>51,978</td>
<td>49,532</td>
<td>37,897</td>
<td>36,402</td>
<td>-7.6%</td>
<td>-32.7%</td>
</tr>
<tr>
<td>Renewable Energy – Solar</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-253</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Purchased Steam</td>
<td>37</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Scope 3</strong></td>
<td></td>
<td>60,077</td>
<td>71,273</td>
<td>100,156</td>
<td>40.5%</td>
<td>-</td>
</tr>
<tr>
<td>Purchased Goods and Services</td>
<td>-</td>
<td>3,213</td>
<td>3,258</td>
<td>13,916</td>
<td>327.1%</td>
<td>-</td>
</tr>
<tr>
<td>Capital Goods</td>
<td>-</td>
<td>2,078</td>
<td>2,048</td>
<td>8,778</td>
<td>328.6%</td>
<td>-</td>
</tr>
<tr>
<td>Fuel- and Energy-Related Activities</td>
<td>-</td>
<td>3,875</td>
<td>3,441</td>
<td>3,723</td>
<td>8.2%</td>
<td>-</td>
</tr>
<tr>
<td>Upstream Transportation and Distribution</td>
<td>-</td>
<td>4,675</td>
<td>7,052</td>
<td>7,250</td>
<td>2.8%</td>
<td>-</td>
</tr>
<tr>
<td>Waste Generated in Operations</td>
<td>-</td>
<td>2,250</td>
<td>1,153</td>
<td>1,160</td>
<td>0.7%</td>
<td>-</td>
</tr>
<tr>
<td>Business Travel</td>
<td>-</td>
<td>16,601</td>
<td>2,931</td>
<td>3,192</td>
<td>8.9%</td>
<td>-</td>
</tr>
<tr>
<td>Employee Commuting¹</td>
<td>-</td>
<td>17,174</td>
<td>43,030</td>
<td>56,466</td>
<td>31.2%</td>
<td>-</td>
</tr>
<tr>
<td>Upstream Leased Assets</td>
<td>-</td>
<td>10,210</td>
<td>8,360</td>
<td>5,670</td>
<td>-32.2%</td>
<td>-</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Scope 1 &amp; 2 (Location Based)</td>
<td>63,539</td>
<td>55,141</td>
<td>47,983</td>
<td>47,142</td>
<td>-1.8%</td>
<td>-25.8%</td>
</tr>
<tr>
<td>Total Scope 1 &amp; 2 (Market Based)</td>
<td>65,734</td>
<td>62,839</td>
<td>48,703</td>
<td>45,485</td>
<td>-6.6%</td>
<td>-30.8%</td>
</tr>
<tr>
<td>Total All Scopes (Location Based)</td>
<td>-</td>
<td>115,218</td>
<td>119,256</td>
<td>147,298</td>
<td>23.5%</td>
<td>-</td>
</tr>
<tr>
<td>Total All Scopes (Market Based)</td>
<td>-</td>
<td>122,916</td>
<td>119,976</td>
<td>145,641</td>
<td>21.4%</td>
<td>-</td>
</tr>
</tbody>
</table>

¹Employee commuting emissions include energy use from office equipment, home heating, and cooling.
Key is committed to fostering diversity, equity, and inclusion throughout the entire enterprise – from the teammates we hire and the clients we serve, to the suppliers we use and the communities that welcome us. Our employees are engaged with and committed to our mission of helping our clients and communities thrive. We are more focused than ever on participating in the economic expansion, revitalization, and resurgence of the communities we so proudly serve, as well as strengthening the financial wellness of our clients.
Everyone’s financial journey is different. We make intentional efforts to meet the individual needs of clients and communities through a diverse range of products, services, programs, and initiatives.

Providing inclusive banking is evident in how we:

- Show up in our communities every single day
- Provide advice and guidance to our clients
- Are accessible when and how clients need us most

In 2021, we worked with the Financial Health Network, the leading authority on financial health in the U.S., to identify opportunities to support equitable financial health outcomes and access for our clients and communities. We also introduced a new role, Emerging Markets Segment Product Manager, within the Consumer Bank Product Management team. This role will focus on helping Key develop and deliver products that meet the needs of LMI communities and clients. The individual in this role partners with teammates across the enterprise, including Product Management, Consumer Payments, Corporate Responsibility, Home Lending, Marketing, and Communications, to align product design, features, and functions with LMI clients’ needs, while developing a measurement infrastructure to monitor progress with clients’ financial health.

KeyBus Community Initiative

To make banking more inclusive for all communities, we continuously look for ways to improve access to financial services. Starting in spring 2022, we are introducing our new KeyBus to bring financial services, as well as financial coaching and financial education, to traditionally under-resourced communities across our footprint.
**KeyBank products and services**

No matter where clients are in their journey, we provide:

- **24/7 account access**
  Secure online and mobile banking allows clients to access and manage their money anytime, anywhere.

- **Financial guidance**
  Expert advice helps clients feel confident about their financial decisions and prepared for all of life’s ups and downs.

- **Build credit**
  A wide range of solutions help clients build or improve their credit.

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**Financial Wellness Center opens in Cleveland’s Ohio City neighborhood**

Key opened a new Financial Wellness Center in our home market of Cleveland, Ohio. Our Financial Wellness Centers are designed to offer a deeper, more personalized banking experience for clients. It’s our way of adapting to changing consumer behavior, requiring fewer in-person transactional needs and more advisory-based services. Instead of a traditional bank lobby, clients walk into an open floor plan with private offices. Financial wellness consultants are available to assist with whatever need clients have – whether it’s simply depositing a check or applying for a consumer or business loan. Clients who wish to complete transactions digitally while on-site have access to WiFi. All tellers and bankers who worked at our previous nearby branch location were trained as financial wellness consultants.

This marks the sixth market in which we have a Financial Wellness Center; other locations include Colorado, Indiana, Utah, Washington, and Columbus, Ohio. The Cleveland center was opened in the historic preservation district of Ohio City, an intentional move to support the ongoing revitalization of this diverse neighborhood and its active business startup community. Branch teammates are also engaged in the surrounding community, mentoring eighth grade students from the nearby middle school, including helping with coursework and discussing career options.
Industry-leading tools and resources

Our products and services help clients start financial journeys, build and improve credit, and make progress toward their financial goals.

**Bank**

**KeyBank Hassle-Free Account® (Bank On certified product)**

- An easy-to-use account, with a chip-secure debit card and secure mobile banking
- No overdraft, minimum balance, or monthly maintenance service charges
- Deposit checks in the mobile app, pay bills, send money, and more

**Key Secured Credit Card®**

- Can help clients establish and improve credit history when the minimum monthly payment is met
- No annual fee
- Secured by a minimum deposit greater than or equal to $300 in a Key Active Saver® account

**Save**

**Key Active Saver account**

- Open with as little as $10, with a waivable monthly maintenance service charge and no minimum balance requirements
- No monthly maintenance service charge when linked to a KeyBank consumer checking account, including the KeyBank Hassle-Free Account (otherwise, there is a $4 fee)

**EasyUp®**

- Service that automatically saves a set amount from every debit card purchase when a client adds it to their KeyBank savings account or to a company account to pay down debt
- Client can determine a transfer amount that works for them, from 10¢ to $5

**Borrow**

**Key Community Mortgage®**

- Does not require a minimum loan amount; it can be used for small dollar mortgages and allows clients to take advantage of low down payment options
- Private Mortgage Insurance (PMI) is not required
- Specialized support from loan officers at local branches

**KeyBank Loan Assist Program**

- Savings-secured loan that is deposited in a Key savings account (minimum $500, maximum $3,500)
- Making regular, on-time monthly payments on the loan can help clients build a good credit history
- Fixed rate, with an option to pay automatically

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1Bank On, led by the national nonprofit organization Cities for Financial Empowerment Fund (CFE Fund), works to ensure everyone has access to a safe, affordable, transactional banking account. 2Other miscellaneous charges apply. Mastercard and the Mastercard Brand Mark are registered trademarks of Mastercard International Incorporated. Please read our Agreements and Disclosures. If you opened your deposit account online within the last 90 days, you may also review the original agreements and disclosures provided to you. 3The variable APR for purchases is 29.99%. There is a $0.50 minimum finance charge where interest is due. The annual fee is $0. Foreign Transaction fee: 3% of the amount of each foreign transaction after its conversion into U.S. Dollars. Transactions originating in Canada are excluded from this fee. 4The monthly maintenance service charge on the Key Active Saver account will be waived for Key Secured Credit Card clients. The monthly maintenance service charge waiver is only valid as long as the Key Secured Credit Card remains open. If you are graduated to an unsecured card or close your Key Secured Credit Card account, the Key Active Saver monthly maintenance service charge of $4.00 may apply, unless you are the owner on a KeyBank consumer checking account (including KeyBank Hassle-Free Account). 5Property must be located in a KeyBank Assessment Area. No income limitations if property is located in LMI census tracts. For all other census tracts, income must be less than 80% of the Federal Financial Institutions Examination Council (FFIEC) Estimated MSA/MD Median Family Income. Completion of a HUD-approved prepurchase homeowners education workshop may be required prior to closing. Landlord counseling may be required prior to closing on all two-unit transactions. Borrowers are not permitted to own any other real estate at the time of closing. 6How Loan Assist works. If you are approved, we make a “loan” to you. The loan proceeds are put into a KeyBank savings account where it earns interest but won’t be available for you to withdraw until the loan is repaid. Once you’ve repaid the loan amount, the money in the savings account – plus any interest earned – is made available and can then be withdrawn to use any way you want. Credit products are subject to credit approval. The creditor and issuer of the Secured Card credit card is KeyBank N.A., pursuant to a license from Mastercard International Incorporated. Mastercard is a registered trademark, and the circles design is a trademark of Mastercard International Incorporated.
Financial education and support

We are committed to providing our clients and communities with the financial education necessary for a successful future. Over the past year, Corporate Responsibility Officers, Home Lending Leaders, and Community Development Loan Officers hosted in-person and virtual financial inclusion and home-buyer education sessions throughout our markets. We also support a variety of national and local organizations – including Junior Achievement, Akron Public Schools in Ohio, and the Connecticut Center for Arts and Technology – that provide students, and unemployed and underemployed people, access to real-world financial tools and technologies that they will encounter with banks and other financial service providers.

Key@Work®

Our Key@Work program serves employers of all sizes by offering a no-cost financial wellness program to their employees. We bring our bankers to them, either in person or virtually, leading educational sessions on a variety of topics, such as understanding credit scores, homeownership, planning for healthcare costs, and managing debt. The program is continuously adapted to meet the diverse needs of the organizations we serve.

Black Homeownership Collaborative

We support the Black Homeownership Collaborative’s seven-point plan to increase Black homeownership by 3 million households by 2030. Key teammates are active in a variety of workgroups focused on housing counseling, down payment assistance, credit and lending, and marketing and outreach.

International Franchise Association

In cooperation with the International Franchise Association (IFA) and U.S. Black Chambers, we sponsored, developed, and executed a four-part webinar series in 2021 for minority entrepreneurs interested in franchise ownership. The series covered practical business readiness, tips for preparing business plans, mentoring and coaching advice from business executives, and first-hand experiences of female minority franchise business owners. More than 400 people registered for the webinars, which are housed on the IFA Foundation and U.S. Black Chamber’s websites and are available to members.

Indiana Black Expo

Key has enjoyed a strong relationship with Indiana Black Expo for many years. We sponsored Indiana Black Expo’s 2021 Minority Business Conference, which was a free, virtual event that featured a roundtable discussion about how to improve utilization of underrepresented businesses in supplier diversity programs across the state. In 2020, we worked with Indiana Black Expo and the Indiana Small Business Development Center to sponsor a webinar series for minority business owners that covered a wide range of topics, including starting a business, business operations, financial health, marketing, developing banking relationships, and succeeding in a post COVID-19 world.

Super Refund Saturday

For the past 15 years, hundreds of teammates have volunteered to help local nonprofit organizations provide LMI wage earners with free tax preparation services and assistance in determining their eligibility for the Earned Income Tax Credit. The event known as Super Refund Saturday is a cost-effective way for local tax filers to navigate the tax preparation process.

Given the challenges of in-person events in early 2021 and our desire to prioritize the health and safety of our teammates, clients, and communities, Key provided philanthropic financial support to 11 nonprofit organizations to assist with tax preparation services for income-eligible households.
Small business support

Small businesses are critical accelerators for the economic health of neighborhoods. Building a successful small business is a challenge that is easier with Key – a bank that understands how to build a small business from the ground up. For our small business clients, we offer financial reviews that focus on four main categories: business, operations, expertise, and solutions.

Key doubles Small Business Administration (SBA) 7(a) lending volume and remains a top small business lender in the country.¹ In October 2021, KeyBank announced it extended 947 loans, totaling $434 million, during the SBA’s FY 2021, more than doubling the number of unit loan approvals to individual small businesses from 2020. The volume moved us into a top 10 position among more than 1,700 participating lenders and represented record-breaking loan volume for Key in terms of units and dollars.

Since 2015, Key has provided more than $2 billion in SBA-guaranteed financing to thousands of small business owners and has continually been ranked among the top SBA lenders in the country.

BEEHIVE: A new way we’re building community in Pittsburgh

In Pittsburgh, we’re working to build a strong, supportive community for small business owners and entrepreneurs who identify as underserved or underrepresented. It’s the driving force behind a new concept we named BEEHIVE, which stands for Building Economic Empowerment Helping Invigorate Ventures and Entrepreneurship. Through networking events and learning sessions, we encourage discussion and education around a variety of pertinent topics to business owners, such as challenges navigating the business banking system, improving financial stability, alternative financing resources, and the minority business certification process.

Funding rising entrepreneurs

Cleveland native Ramat Wiley has a long-standing personal banking relationship with Key. When she decided to start her own business, Adun Spice Company, in 2020, Key was naturally the first place she turned to for support. We worked with her to open a business banking account and secure an SBA loan.

As a food stylist turned entrepreneur, Ramat has developed strong relationships with local chefs and the culinary community in Cleveland. Giving back to this community is a priority for her business: Adun Spice Company donates a portion of its profits to local food charities, families in need of food, and uplifting other culinary entrepreneurs. We are proud to support Ramat on her journey as an entrepreneur and her resolve to help others in need.

¹Source: According to statistics released by the U.S. Small Business Administration (SBA) FY 2021.
Key4Women®: Empowering women in business

Through advocacy, connections, and empowerment, Key4Women supports the financial progress and empowerment of businesswomen, providing a wealth of resources to help them meet their personal and professional goals. Since its launch in 2005, our certified advisors have facilitated more than $12 billion in loans to women-owned businesses.

The program offers:

- Customized financial services and advice from Key4Women certified advisors
- Exclusive member events and forums with industry experts to help foster professional and business development while creating lasting connections with industry leaders and professionals
- Timely and robust thought leadership content and insights covering the latest in financial and business trends to help women succeed
- Strong support of national and local women organizations

In 2021, Key4Women experienced record growth in new certified teammate advisors and client member enrollment. This growth is a direct reflection of Key’s commitment to diversity, equity, and inclusion in our workforce, workplace, and marketplace.
Navigating a global pandemic

Key continued to help small businesses, nonprofits, and entrepreneurs navigate another challenging year due to the ongoing COVID-19 pandemic. Programs and initiatives, such as KeyBank Assists and the Paycheck Protection Program, have been instrumental to providing extra help to businesses, nonprofits, and individuals that continue to struggle economically.

KeyBank Assists

To help ease stress and bring optimism to our communities, we continued the KeyBank Assists program, which launched in 2020 in response to the pandemic. Over the past two years, KeyBank Assists provided donations, meals, and surprise gifts to small businesses, families, and essential workers in communities across our banking footprint. We enlisted the help of influential public figures, athletes, and amazing local chefs to make the surprises even better.

More than $1 million has gone directly to our communities through the KeyBank Assists program. Through the program, Key helped more than 350 community organizations, nonprofits, and small businesses. We also provided thousands of gift cards and meals to families, essential workers, and first responders.

KeyBank Follows Your Lead: Surprising businesses through GoFundMe

In response to ongoing financial struggles, many small businesses and organizations turned to GoFundMe to raise the funds necessary to keep their doors open. During August and September 2021, Key surprised 22 organizations in the communities we serve by fulfilling their GoFundMe campaigns through KeyBank Follows Your Lead. We contributed amounts from $3,000 to nearly $25,000, depending on the organization’s need. All organizations were women-owned, minority-owned, or served the LMI community.

Among the small businesses that received our help:

<table>
<thead>
<tr>
<th>Business</th>
<th>Location</th>
<th>Amount Donated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soulcraft Community Woodshop</td>
<td>Cleveland, Ohio</td>
<td>$24,960 toward their $26,000 goal</td>
</tr>
<tr>
<td>Lovejoy Village</td>
<td>Buffalo, New York</td>
<td>$4,115 toward their $5,000 goal</td>
</tr>
<tr>
<td>Kindness Farm</td>
<td>Portland, Oregon</td>
<td>$16,155 toward their $20,000 goal</td>
</tr>
</tbody>
</table>

KeyBank Assists partners include Chef Darian Bryan, blogger Linh Phillips, former Harlem Globetrotter Tay Fisher, and social media manager Emily Schultz.
# Paycheck Protection Program

As a national leader in accepting Paycheck Protection Program (PPP) applications, Key’s participation reflects an important way we support clients and communities when they need us most. Through a highly focused and coordinated effort during rounds one, two, and three, we processed approximately 70,000 SBA-approved PPP loans and provided nearly $11 billion in loans for small- and mid-sized businesses nationwide. Twenty-five percent of those loans were for businesses in LMI communities. Key’s Small Business Banking team partnered with Corporate Responsibility Officers across our 15-state footprint to engage businesses in LMI neighborhoods and advise them with information about PPP funding.

<table>
<thead>
<tr>
<th>20%</th>
<th>25%</th>
</tr>
</thead>
<tbody>
<tr>
<td>OF SBA-APPROVED applications were to businesses in low- to moderate-income areas</td>
<td>OF SBA-APPROVED application dollars went to businesses in low- to moderate-income areas</td>
</tr>
</tbody>
</table>

- **~70K** Business loans processed through three rounds of PPP
- **$11.0B** in critical funding
- **$9.5B** in loans forgiven via ~59,000 loans by the SBA as of January 28, 2022
Fair and responsible banking practices

Key provides comprehensive financial solutions to help clients achieve their goals of financial wellness and we strive to create lasting positive impact in the communities in which we operate. Key achieves this vision through deeply held values of teamwork, respect, accountability, integrity, and leadership. Key is committed to treating each consumer and customer with integrity and respect and to providing quality service that is prompt, competent, diligent, and courteous. Moreover, Key’s goal is to help every client understand available products and services, so that they can make informed financial decisions that are the most appropriate for their circumstances. Integral to this vision is a commitment to fair, consistent, and responsible treatment of consumers and customers.

Fair and responsible banking (FARB) laws, regulations, and regulatory guidance apply to Key’s business functions, all employees, and third parties acting on Key’s behalf and are implemented throughout Key and its subsidiaries. The same principles of anti-discrimination and fairness apply to all employees, including customer relations, through Key’s Code of Business Conduct and Ethics and the Professional Conduct Policy. Our FARB policies, programs, and practices are designed to proactively identify, measure, monitor, control, and report FARB-related risks; provide a credible challenge of business activities across products and services; and support effective risk management activities related to fair lending and unfair, deceptive, abusive acts or practices (UDAAP), as outlined below.

Managing complaints

Negative feedback provides us with an equally important opportunity to make improvements to the way we conduct business. Key’s dedicated customer service professionals, including our Social Customer Care team, are trained to respond to and process these issues appropriately. A variety of monitoring systems are used to scan for negative comments that surface via client surveys and digital channels. Our Customer Service and Social Customer Care teams resolve most complaints directly. For those that require additional support or raise more serious concerns, there are clear escalation processes in place. Complaints alleging discrimination or similar unfair treatment are treated very seriously and are escalated, as appropriate, to involve our DE&I and Fair and Responsible Banking teams to ensure the concerns raised have been appropriately addressed and responded to timely. Furthermore, complaints are tracked to determine trends, identify areas for enhancement, and inform management where there may be opportunities to improve customer experience.

Responsible, accessible products and services

We are responsive to the needs of individuals with disabilities and provide a variety of accommodations to meet their needs for positive banking experiences. For example, those with visual impairments can request Braille or large print statements and sight checks. All ATMs are equipped with voice guidance units and Braille instructions and are regularly tested for compliance to the Americans with Disabilities Act. Our website and online banking are compatible with screen reader software. TTY or Text Telephone services are available for the hearing impaired. Fax machines, 24-hour touch-tone account information, and drive-up ATMs are available to accommodate those with mobility, hearing, sight, and speech impairments.

Key is also working to reduce potential language barriers through our Spanish language website and marketing materials.

Listening to clients

We have a diverse client base. Understanding their evolving needs and experiences is critical to our success. That’s why we employ a variety of methods to gather feedback from clients. We recently redesigned our client surveys to gather more meaningful insights and launched them from a new, state-of-the-art, experience platform. We are evaluating themes we uncovered from client feedback, while employing new approaches to drive action. Social media is another important communication tool; our highly experienced Social Customer Care team monitors social channels closely and manages follow-up communication, as appropriate. We also solicit client feedback in the design and development of new products via our client panel called Voices.
Employee training and reporting

Teammates receive mandatory training, based on their role at Key, on a range of topics including FARB, anti-money laundering, consumer advertising compliance, Key’s Code of Business Conduct and Ethics, managing risk, protecting Key’s assets, and fraud awareness and escalation.

We require teammates to report any suspected UDAAP violations to their manager or to the ethics helpline. These reports remain confidential, and teammates are protected against retaliation (e.g., termination, demotion, harassment).

Employee compensation

Our success depends on the ability to attract, retain, motivate, and develop our people. We provide competitive total rewards, including pay and benefits, that support these efforts. Competition for talent in our business is strong, and we increasingly compete for talent outside of the core financial services industry. We make investments to hire and retain the talented and diverse teammates we need to serve our customers. We also work to create and sustain a culture that is inclusive and fair.

Our compensation program is designed to reward employees based on performance, be informed by the market (including changes in minimum hourly wage practices and role-specific wage pressure), discourage imprudent risk-taking, and align with the interests of our shareholders and guidance from regulators. Our pay for performance culture is guided by the following three principles:

- Pay decisions are based on Key’s performance, business unit performance, and individual performance

- We deliver pay in a way that reinforces focus on balancing short- and long-term financial performance objectives

- We support sustainable performance with policies that focus on prudent risk-taking and the balance between risk and reward

Achieving a balance between risk and reward is a central focus of our compensation program and an important part of how we align pay and performance. We subject all incentives paid to our employees to a risk-adjustment process that begins before grant and extends beyond payment. Variable compensation plan designs and payments are monitored throughout the year. Our retail incentive plan includes an emphasis on client experience and risk management with variable compensation representing less than 10% of pay to retail employees. Additionally, the Consumer Bank sales practices monitoring program proactively reviews our sales and service culture, incentives, and resulting behaviors for potential drivers of employee fraud and misconduct.

Our pay programs are focused on providing fair, equitable, and competitive compensation to our employees. We increased the base hourly wage at Key to a range of $16 to $18 per hour in March 2020 and then again to a range of $18 to $20 in March 2022. By March 2022, 96% of hourly employees were being paid at or above $18 an hour. As appropriate, further adjustments were made for those employees who were close to the new minimum hourly rate, in addition to other adjustments to support the competitiveness of our compensation framework. We continuously monitor a number of factors when setting pay, including the competitive market, benchmarking surveys, and internal equity.
INVESTING IN COMMUNITIES

In 2021, Key proudly concluded our groundbreaking five-year, $16.5 billion National Community Benefits Plan. Over the course of the plan period, we provided more than $26.5 billion in lending and investments to communities across America, exceeding the aggregate financial commitments of the plan.

Surpassing the commitments of our National Community Benefits Plan has brought access to capital for neighborhoods and neighbors who have often faced barriers to financial support. These investments supported affordable housing and community development projects nationwide; small business and home lending in LMI communities; and philanthropic efforts targeted toward education, workforce development, and building safe, vital neighborhoods.

Having achieved the aggregate financial commitments of our initial National Community Benefits Plan one year ahead of schedule, Key announced an extension and expansion of our plan in early 2021, committing to invest more than $40 billion in the communities we serve.

To ensure our plan continues to best serve our communities, we worked with the National Community Reinvestment Coalition (NCRC) to gather community feedback throughout our footprint. Key and the NCRC hosted seven community listening sessions in 2021 to learn what is most important to the communities we serve. We also gathered feedback from Key’s National and Regional Advisory Councils. These listening sessions, in combination with the impact we’ve seen from the first five years of the plan, are actively shaping our community investments.

<table>
<thead>
<tr>
<th>Community Benefits Plan Commitments (2017 – 2021)</th>
<th>Five-Year Plan Commitment</th>
<th>2021 Activity</th>
<th>Total Investments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community development lending &amp; investing</td>
<td>$8.8B</td>
<td>$4.1B</td>
<td>$17.2B¹</td>
</tr>
<tr>
<td>LMI mortgage</td>
<td>$5.0B</td>
<td>$2.0B</td>
<td>$5.7B</td>
</tr>
<tr>
<td>LMI small business lending</td>
<td>$2.5B</td>
<td>$832.9MM</td>
<td>$3.5B</td>
</tr>
<tr>
<td>Transformative philanthropy</td>
<td>$175.0MM</td>
<td>$33.8MM</td>
<td>$179.5MM</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$16.5B</strong></td>
<td><strong>$6.9B</strong></td>
<td><strong>$26.5B</strong></td>
</tr>
</tbody>
</table>

¹As of December 31, 2021, $1.13B of PPP loans that qualified as Neighborhood Revitalization loans were included: $953MM for 2020 and $178.1MM for 2021
Affordable housing and community development

KeyBank Community Development Lending and Investment (CDLI) provides capital for projects that stabilize and revitalize communities. The pandemic and the resulting economic downturn have underscored the nation’s affordability crisis and the need for safe and affordable housing across all of our communities. Making investments in housing for urban and rural communities across the country remains a priority for Key.

As one of the top affordable housing lenders in the country, Key’s CDLI platform brings together balance sheet, equity, and permanent loan offerings. In 2021, we invested approximately $4 billion in community development and affordable housing projects nationwide. Since 2017, Key has deployed more than $17 billion in aggregate CDLI commitments, representing 195% of the CDLI $8.8 billion National Community Benefits Plan commitment. Key was named the #2 affordable housing lender in 2021.

Recent deals:

KeyBank CDLI provided $16.3 million for the development of Homeward – Central Harlem in New York City. The property will exclusively serve unhoused youth between the ages of 18 and 25, a vulnerable underserved demographic in New York City, in an LGBTQ-affirming community.

KeyBank CDLI Vice President and Relationship Manager Derek Reed speaks about a $10 million investment Key is making in Detroit’s Housing for the Future Fund. The initiative, announced by Mayor Michael Duggan in 2021, represents the largest single private commitment to affordable housing in Detroit’s history.

$4.1B
AFFORDABLE
housing loans and
investments in 2021

$17.2B
INVESTMENTS
since the inception of the National
Community Benefits Plan in 2017

#2
AFFORDABLE
HOUSING LENDER

1As of December 31, 2021, $1.13B of PPP loans that qualified as Neighborhood Revitalization loans were included: $953MM for 2020 and $178.1MM for 2021
2National Low Income Housing Coalition: The Gap Report (published March 2022); Affordable Housing Finance FY 2021 Ranking
Home lending

Homeownership is essential to building healthy and thriving neighborhoods. Key offers a variety of mortgage programs focused on meeting the needs of LMI borrowers and communities. Our commitment to supporting homeownership comes alive as part of our National Community Benefits Plan. In 2021, we provided $2 billion in mortgages to LMI borrowers, an increase of 28% year over year.

$2.0B MORTGAGES to LMI borrowers in 2021

$5.7B MORTGAGES to LMI borrowers since the start of the National Community Benefits Plan in 2017

Small business lending

Building a small business from the ground up is challenging – strong small businesses are the heart of thriving communities. As part of our National Community Benefits Plan, we provided approximately $833 million in small business loans to LMI urban and rural communities.

$832.9MM IN SMALL BUSINESS lending in 2021

$3.5B IN SMALL BUSINESS lending since the inception of the National Community Benefits Plan in 2017
Transformative philanthropy

KeyBank Foundation and First Niagara Foundation are focused on catalytic investments to build stronger communities and improve the quality of life for our neighbors and neighborhoods.

For the past five years, Key's National Community Benefits Plan and commitment to ESG has helped guide our philanthropic investments. In 2021, we intensified our philanthropic focus on supporting economic, environmental, and racial equity across the country. Philanthropic investments exceeded $33 million in 2021 as we supported communities in a variety of ways.

$33.8MM
PHILANTHROPIC
investments in 2021

$179.5MM
PHILANTHROPIC
investments since the inception of the National Community Benefits Plan in 2017

Through grants and sponsorships, we make dreams a reality by supporting organizations and programs that prepare individuals for thriving futures. Our funding priorities focus on neighbors, education, and workforce development. Our grants for neighbors support creating safe, healthy, affordable, inclusive communities with thriving families and small businesses. Education grants help students prepare for fulfilling careers by providing access to high-quality education and offering support for academic achievement. Workforce development grants help adults acquire the skills, education, and capabilities to succeed in the current and future job market. In addition to our philanthropic investments, we donated more than $11 million in direct contributions and asset donations, such as office furniture, sponsorships, and charitable (cash) contributions.

<table>
<thead>
<tr>
<th>Key philanthropic investments</th>
<th>Key teammate impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education $7.9MM</td>
<td>Community leadership gifts$^2 $163.5K</td>
</tr>
<tr>
<td>Neighbors $17.8MM</td>
<td>Employee donations and matching gifts $2.1MM</td>
</tr>
<tr>
<td>Workforce $3.1MM</td>
<td>United Way pledge and corporate match $3.1MM</td>
</tr>
<tr>
<td>Civic good$^1 $4.9MM</td>
<td>Total Employee Impact $5.4MM</td>
</tr>
<tr>
<td>Total Key Philanthropy $33.8MM</td>
<td></td>
</tr>
</tbody>
</table>

$^1Civic good covers a broad range of local community organizations, from health & human services to the arts. $^2The Community Leadership Gift Program provides up to four $500 grants to qualifying organizations per year per eligible employee through the KeyBank Foundation.
Economic access and equity

Our philanthropic investments are designed to help create safe, healthy, affordable, and inclusive communities where individuals, families, and small businesses thrive. The pandemic has disproportionately impacted LMI communities, heightening awareness of the systemic challenges faced by many Americans. In 2021, Key supported organizations across the U.S. that are increasing and strengthening economic access and equity in LMI communities. For example, we worked with Neighborhood Allies in Pittsburgh, Pennsylvania, a nonprofit organization that provides comprehensive and sustainable social, racial, and economic programs to communities facing barriers to financial support. We also supported CHN Housing Partners in Cleveland, Ohio, and the Bank On program in various markets across our footprint.

Racial equity

KeyBank Foundation’s long-standing commitment to diversity, equity, and inclusion continued in 2021, as we provided $18.6 million in grants to organizations and programs focused on social justice and racial equity. This included investments in organizations supporting the creation and growth of minority-owned small businesses. Examples include the Black Futures Fund, a fund of the Cleveland Foundation, in Cleveland, Ohio, and the South Valley Chamber Economic Development Foundation in Salt Lake City, Utah, which are working to increase access and inclusion for minority-owned businesses. Additional funds supported initiatives that are building community dialogue about race relations, building capacity of Black-led organizations that support historically underserved communities, and projects counteracting systemic racism.

Environmental equity

Climate stewardship is a consideration of KeyBank Foundation investments, which support our efforts to reduce Key’s environmental footprint and build a sustainable economy and communities. From increasing green jobs in Maine to empowering neighborhood farm entrepreneurs in Alaska, we support our communities in fighting the impact of climate change. For example, we’re working with Maine Community College Systems to create a pathway for providing needed licensed electrical workers to the state. Workforce development innovations such as this are crucial to helping Maine achieve its goal of sourcing 80% of the state’s energy from renewable sources by 2030.
At Key, diversity, equity, and inclusion aren’t just cornerstones of our culture – they are business accelerators. Advancing DE&I efforts involves a collaborative partnership between our DE&I team, Human Resources team, lines of business, and other support teams.

Each line of business is required to develop an annual DE&I action plan, which is approved by its respective Executive Leadership team leader and managed by one of the appointed DE&I champions across the organization. DE&I champions help to align line of business DE&I action plans with Key’s overall strategy. Progress against these plans is monitored monthly.

In 2021, the Compensation and Organization Committee of our Board of Directors enhanced the KeyCorp Annual Incentive Plan to include a number of workplace, workforce, and marketplace-focused goals related to DE&I. We believe that linking a portion of executive pay to performance against these goals is an important way to foster Key’s commitment to DE&I.

Our enterprise DE&I Strategic Operating Council meets quarterly to review DE&I performance, progress, and best practices. The Council was redesigned in 2021 to better connect executives and DE&I stakeholders with three subcommittees aligned to the core pillars of our DE&I framework – workforce, workplace, and marketplace. The Council is co-chaired by our CEO and Chief DE&I Officer, and includes our DE&I team, the three subcommittees comprised of subject matter expert leaders, and members of our Executive Leadership team.

I’m energized by the opportunities that lie ahead and eager to advance Key’s long-standing commitment to diversity and inclusion in our workplace, our workforce, and our marketplace.

Helena Haynes-Carter
**DE&I: Workforce**

Key is proud to employ a diverse pool of talented teammates that personify our core values. Who we hire and promote shapes who we are as an organization, and DE&I is deeply embedded in our hiring, retention, promotion, and compensation practices.

**Recruiting philosophy and focus**

Key’s recruiting strategy includes initiatives aimed at actively seeking candidates from diverse backgrounds. We are accelerating a range of initiatives to make our hiring process even more inclusive and equitable, from utilizing a new digital tool to reach diverse students to launching an internal Workforce Inclusion Referral Program targeting positions currently underrepresented in diverse groups.

Attracting, retaining, and developing talent that reflects the diversity of our clients and the communities we serve is imperative. We participate in and host recruiting opportunities for candidates who self-identify as a minority (by race/ethnicity), female, current military or veteran, individual with a disability, and/or LGBTQ (lesbian, gay, bisexual, transgender, or queer).

### 2021 Talent Highlights

<table>
<thead>
<tr>
<th>Metric</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diverse External Hires</td>
<td>70%</td>
</tr>
<tr>
<td>People of Color (POC) Promotions</td>
<td>26%</td>
</tr>
<tr>
<td>Female Promotions</td>
<td>60%</td>
</tr>
<tr>
<td>POC Improvement in Senior Leadership</td>
<td>16%</td>
</tr>
</tbody>
</table>

1EEO-1 data was not finalized at the time of publication.
Acquiring new talent

Talent acquisition continues to be an area of focus, including strengthening the capabilities of recruiters, striving for diverse candidate slates, and expanding overall recruiting efforts within diverse populations, including Hispanic-Latinx, African Americans, individuals with disabilities, and veterans.

Our commitments: leadership representation

Consistent with our long-standing commitment to diversity, equity, and inclusion, in 2021, Key publicly committed to increase people of color (POC) representation in senior leadership and executive roles by 25% by 2025, and 50% by 2030. These targets are not quotas, but Board-approved continuous improvement measures as we work to raise the bar for ourselves and for the financial services industry as a whole. As of the end of 2021, Key increased POC representation at our senior leadership and executive levels by 16%.

Creating support for leaders of color

Key regularly looks for ways to provide support for its diverse leaders. Our Black Leader Forum fosters engagement among Key’s senior Black leaders and with our Executive leadership team and Board of Directors. The forum is sponsored by CEO Chris Gorman and drives transparent dialogues for increasing Black representation and leadership at Key.

2021 targeted talent development programming included the launch of an Inclusive Leader session for Key’s Accelerated Development Program, for top talent, as well as training provided by the McKinsey Black Leadership Academy and the Hispanic Alliance for Career Enhancement.
Our pay equity commitment

Key is committed to pay equity across our entire workforce. As of February 2022 at Key, women earn on average more than 99% of what their male teammates earn, and people of color earn on average more than 99% of what their white teammates earn, after taking into account an employee’s job. Our analysis is based on total compensation (base salary and all discretionary incentives) covering all teammates eligible for discretionary incentive, other than our Executive Leadership team whose pay is set by our Board of Directors.

Moving forward we will continue to report our pay parity measures annually and will continue to evolve our disclosure as the landscape develops.

How we support pay equity

Key’s commitment to pay equity is foundational to our culture, which is supported through our policies and practices in the following ways:

• We maintain a formal compensation structure to establish pay based on objective factors, including external market survey data, required education, and experience. We regularly review this structure relative to market trends and internal equity.

• We have a pay for performance philosophy in which pay decisions are based on the assessment of individual performance, business unit performance and the performance of Key. These decisions also consider performance against risk expectations and whether a teammate has exhibited behaviors consistent with our values.

• As part of our year-end compensation process, we complete a pay practice review by race/ethnicity and gender to make sure pay and performance are aligned. If disparities are found, adjustments are made as warranted.

• In compliance with various state and local laws and as part of Key’s long-standing commitment to equal employment opportunity, we do not seek current base compensation information from applicants, regardless of location, or consider an applicant’s compensation history when formulating an offer. Key also provides salary range information when requested by applicants, supporting greater pay transparency during the hiring process, and further enhancing practices that support pay equity and fairness.

• We continually assess and enhance our practices and engage third-party partners to consult on our pay equity analysis and practices as needed. The framework used to analyze pay discrepancies has been in place for more than 10 years, and it has evolved over time to become even more comprehensive. As a result, we believe our practices are an effective control to monitor and address pay inequities.
Social Responsibility

Workforce recruitment and engagement initiatives

Autism at Work initiative

Our Autism at Work initiative, which has been in place since June 2019, is a great example of how Key is taking steps to create a more inclusive workforce. The Precisionists, Inc. (TPI) – an organization that aims to create jobs for 10,000 people with disabilities by 2025 – helps us identify, train, and hire contractors who are neurodiverse. The Autism Society of America bestowed TPI with a prestigious award for its work.

Building on the success of our pilot class of TPI contractors, we expanded the program into our Residential Mortgage operations and added more contracted workers. We converted several TPI contractors to full-time teammates in 2021 and are exploring expansion of the program across other areas of the bank.

Minority MBA Student Case Competition

Key teamed up with Fisher College of Business at The Ohio State University to present the 17th Annual Minority MBA Student Case Competition. The competition gives minority MBA students an opportunity to present their solutions to current business issues facing Key.

In 2021, a diverse slate of 25 Key executives served as speakers and judges for the competition. Our executives participated in five one-hour presentation sessions, training calls, and worked with students to hone their communication and team-building skills. Twenty-two teams from the nation’s leading institutions presented. Students from Johns Hopkins University’s Carey Business School won first place in the case competition.

Student Summit on Diversity, Equity, and Inclusion

Key hosted its second annual Student Summit on Diversity, Equity, and Inclusion – a half-day virtual event that brought together a diverse group of students from all over the country. Students learned about our intern programs, heard from our Chief Diversity, Equity, and Inclusion Officer and a panel of former interns, and interacted with our recruiters in a small group setting. Key extended 14 offers and welcomed 10 new diverse teammates as a result of the summit.

“...In the Mortgage department, I’m learning so much about the different types of mortgage documents, time management, and developing my people skills. My goal is to use this opportunity to learn as much as possible about business and being in a professional environment to one day become an office manager.

Jessica Opria  TPI Associate

*KeyCorp is an Equal Opportunity and Affirmative Action Employer committed to engaging a diverse workforce and sustaining an inclusive culture. These programs and events are intended as diversity recruiting, advancement and retention initiatives in support of Key’s affirmative action and equal employment opportunity efforts. All qualified applicants receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status or any other protected status.
DE&I: Workplace

Key strives to create a safe and supportive work environment where everyone is equally valued and respected. Ongoing growth and learning is encouraged through our employee resource groups, training and development programs, and advocacy around critical issues.

Employee resource groups

Key’s 12 employee resource groups, known as Key Business Impact and Networking Groups (KBINGs), play an important role in shaping our culture, offering support, connection, and engagement for teammates. It has been a particularly vital link for connecting teammates in an evolving environment of remote work. In 2021, 58% of teammates belonged to at least one of our KBINGs.

Diversity, equity, and inclusion training for teammates

Teammate training and development is crucial to shaping our award-winning DE&I culture. In 2021, we added a third course to our DE&I curriculum called “Crossing the Bridge.” It focuses on racial justice and allyship, covering topics such as tackling racism at work, understanding privilege, and addressing racial and affinity biases.

Building organizational and personal accountability is part of creating a more inclusive culture. To instill a foundational understanding of diversity, we made it mandatory in 2021 for all employees to complete our “Building Bridges” training course, which discusses how to identify and mitigate unconscious bias.

Across the entire enterprise, our leadership is making a concerted effort to encourage teammates to complete our DE&I curriculum. As a result of targeted communication campaigns and incorporation of completion goals in DE&I action plans, 97% of employees completed our “Building Bridges” training, and we saw 57% improvement in the completion rate for our “Bridging the Gap” course, which focuses on inclusion-driven awareness and best practices.
Social Justice and Racial Equity Speaker Series

The Social Justice and Racial Equity Speaker Series was created to help our teammates navigate the social unrest that followed George Floyd’s murder. Launched in 2020, this program brings trailblazers in diversity, equity, and inclusion to introduce new perspectives and spark dialogue among Key’s teammates. The series supports teammates as they continue to learn, grow, and advance efforts to ensure equity for everyone in our company and communities. In 2021, Key hosted nine engagements that drew over 12,000 attendees; numerous subsequent sessions were held across the enterprise to continue the conversations. The series was so well received, Key will continue to bring in speakers throughout 2022.

Social Justice and Racial Equity Speakers Series keynote presenters: Soledad O’Brien, Maria Hinojosa, and Dr. Howard Stevenson.

Advocating for racial equity

Key developed a strong response to the increased discrimination and acts of hatred against Asian American Pacific Islander (AAPI) communities. We took steps to provide both philanthropic support to external organizations and initiate internal dialogue, aimed at creating safe and supportive spaces for our AAPI teammates, clients, and communities.

KeyBank Foundation spearheaded a special 2:1 community match program for eligible nonprofit organizations at both a national and local level, such as the Asian Pacific Islander American Public Affairs Association and Asian Americans Advancing Justice.

We also invited Pulitzer Prize-winning author Viet Thanh Nguyen to speak to our teammates about Anti-Asian violence and the AAPI experience in America. More than 1,200 Key teammates attended the event.
DE&I: Marketplace

Driving greater economic inclusion and equity across our supply chain is a collaborative effort among the Procurement, DE&I, and Finance teams, as well as our Head of Supplier Diversity and our lines of business. Across the company, we have supplier diversity champions who are accountable for achievement of supplier diversity goals for their departments.

Key has a long-standing commitment to building mutually beneficial relationships with businesses that are certified as diverse, meaning they are at least 51% owned, managed, and controlled by U.S. citizens who are minorities, women, veterans, service-disabled, LGBT, or individuals with a disability. We refreshed our RFP selection questionnaire in 2021 to ensure suppliers submit relevant business certifications tied to diversity criteria. In addition, we updated our Supplier Code of Conduct to clarify our commitment to DE&I, which includes setting expectations for suppliers, such as demonstrating diversity in their executive and board leadership.

Supply chain diversity spending

In 2021, we achieved our enterprise goal of directing 8% of our qualified spend to diverse suppliers (Tier 1 and Tier 2). This was an increase of more than $15 million compared to 2020. We also achieved a 70% increase in the number of Tier 1 and Tier 2 suppliers year-over-year.

These improvements can be attributed, in part, to successfully onboarding new Tier 1 suppliers and proactively working to improve Tier 2 diversity spend and reporting among our largest suppliers. Key’s finance transformation initiative, which included upgrades to our information systems and technology platforms, also played a role. These changes improved how we identify diverse suppliers in our system and how we track diverse spend.

Diverse spend and supplier KPIs are reported bimonthly to our Board of Directors.

Activating change

Key is also active in broader efforts to improve supply chain diversity and economic inclusion. We do this by supporting and collaborating with a variety of external organizations, including Financial Services Roundtable, Greater Cleveland Partnership, National Minority Supplier Development Council, Ohio Minority Supplier Development Council, and the Buffalo Purchasing Initiative.

Collectively, these efforts are improving DE&I transparency and accountability for Key’s existing and new supplier relationships.

In July 2021, Key was recognized by Black EOE Journal as one of the Best of the Best for Supplier Diversity Programs. The annual designation evaluates the nation’s employers, initiatives, and government agencies, promoting the advancement of African Americans in all aspects of business and employment to ensure equal opportunity.
At Key, we want our teammates to thrive. Our total rewards strategy is designed to help employees feel supported on every level. We provide a comprehensive, competitive set of compensation and benefits programs that are driven by employee feedback and personalized to the needs of teammates. We support teammates holistically across the dimensions of pay, benefits, career development, and well-being.

**Employee benefits and wellness**

We take seriously our responsibility to offer benefits that empower teammates to take control of their physical, emotional, and financial health. It’s a critical tool for rewarding teammates’ valuable contributions. Our robust benefits program includes many lifestyle benefits that meet the diverse needs of our workforce.

Key regularly evaluates ways to enhance our benefits program. A few notable changes in 2021 included:

- **Extended parental leave**
  Paid leave for new parents – whether through birth, adoption, fostering, or surrogacy – increased from six weeks of leave to 10 weeks to provide more bonding time with a child.

- **Identity protection**
  Key now offers comprehensive financial and identity monitoring at reduced rates to help protect against the impact of identity theft.

- **Vision**
  We introduced a new Vision Plan carrier, VSP, which offers teammates reduced premiums on vision care.

- **Critical illness insurance**
  We updated our policy to include coverage of more critical illness conditions and lower premiums.

- **Pay update**
  We increased our minimum base hourly wage rate to $18 – 20 an hour in 2022, impacting employees in various areas of the company, including our branch network, call center, and technology and operations organization.

- **Mental and emotional wellness support**
  We launched a more comprehensive employee assistance program, called Live Well and Thrive Employee Support and Wellness Program. The program combines both mental and physical health support to simplify the employee experience in one platform.
By the numbers:

**6,502**

**EMPLOYEES CLAIMED**

reimbursement for eligible fitness costs, totaling $1.8 million

**NEARLY**

**$1 MILLION**

reimbursed for college tuition for 249 teammates

**AWARDED 25 SCHOLARSHIPS OF**

**$2,500 EACH**

to dependents of employees through the KeyBank Scholarship Program

**1,266**

**CAREGIVERS RECEIVED**

access to counseling and other resources; service valued at more than $453,000

**59%**

**OF EMPLOYEES**

used employee support resources and services and 76% used wellness resources and services through Key’s Live Well and Thrive Employee Support and Wellness Program

**55 EMPLOYEES GRANTED UP TO**

**$3,000**

through KeyBank’s Hardship Assistance Program, totaling $136K in support

**5,219**

**TEAMMATES ATTENDED**

financial wellness workshops, including employee banking webinars and financial wellness reviews

**92%**

**OF TEAMMATES**

contributed to our 401(k) plan; employee contributions are fully matched up to 6%
<table>
<thead>
<tr>
<th>Program</th>
<th>Overview</th>
<th>Offerings</th>
</tr>
</thead>
</table>
| Live Well and Thrive Employee Support and   | Offers teammates up to six sessions of confidential counseling per year, unlimited legal and financial consultations, and wellness coaching. It is available to all employees at no cost and is completely confidential. | • Confidential emotional support  
• Wellness tools  
• Wellness coaching (digital or telephonic) for exercise, nutrition, weight, stress, sleep, and more  
• Interactive digital tools and online resources  
• Work-life, legal, and financial consultations |
| Wellness Program                             |                                                                                                                    |                                                                                                                             |
| Personal wellness and growth                | We want teammates to have well-rounded lives with the resources they need to live life to the fullest. The Wellness Team helps teammates thrive in all aspects of life through a range of programs. Our most popular programs last year were our guest speakers for Thrive Weeks, which included Chef Jet Tila, and our 15-minute weekly wellness breaks to help employees with stress, balance, and energy. | • Thrive with Key monthly emails  
• Wellness weeks (“Thrive Weeks”) with keynote guest speakers  
• Quarterly wellness challenge  
• Webinars  
• Fitness and self-care challenges  
• Weekly sessions for stress/balance, energy, health cooking, yoga, and fitness  
• 90-day healthy lifestyle transformation program |
| Medical plan                                | Eligible employees can choose between three high-deductible health plans. Teammates who are enrolled in the Key medical plan are also eligible to receive the benefits listed to the right, which provide additional assistance to those managing serious health conditions or critical illnesses. | • Wellness incentive HSA contribution  
• Disease management support programs for selected chronic conditions  
• Expert second opinion by 2nd.MD offers personalized video consultations  
• Cancer support program  
• Fertility solutions program  
• Maternity support program |
| Snapshot of nontraditional benefits offerings | Key offers teammates exceptional benefits through our core benefits program.                                          | • Adoption assistance, which includes $14,400 in financial assistance and 80 hours of adoption time  
• Child and elder care support services, from tutoring to a dependent care flexible spending account (FSA) plan  
• College tuition reimbursement  
• Fitness reimbursement up to $300 per year for eligible expenses  
• Hardship relief, up to $3,000 for qualifying event  
• Donation matching opportunities, from community leadership gift to employee donation match  
• Personal, parental, short-term medical, military, health, and family leave  
• Scholarships for children of teammates  
• A rate discount on student loan refinancing through Laurel Road |
**Employee banking and financial wellness**

At Key, our teammates are treated as valued banking clients. We want all teammates to have the financial confidence to pursue their dreams. To support their financial journeys, Key offers a diverse range of product benefits and discounts, as well as support through our Live Well and Thrive financial guidance programs.

We want to ensure our teammates have the best possible experience when banking with Key. We launched a new program to reach newly hired employees to welcome them to Key and assist them with their banking needs before day one of employment. Key expanded the number of Employee Banking Certified branches, which are specially trained branches to support the needs of our employees. We introduced a new process to enable employees who reside outside of the Key retail banking footprint to have an opportunity to open a checking or savings account with Key. We held our second annual Employee Banking week, a week dedicated to our teammates, providing education, resources, and our annual survey to improve the Employee Banking experience.

**2021 employee banking performance**

- 97% of teammates bank with Key
- $55 million saved by teammates using short- and long-term savings products
- 81% of eligible teammates have a health savings account
- $2.6 million saved by teammates using EasyUp\(^1\) since the service launched

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**Voice of the Employee Forum**

Key’s Voice of the Employee (VoE) Forum is a digital platform that allows teammates to share their ideas and suggest ways to improve the client and employee experience – empowering teammates to be change agents.

Since its launch in 2018, more than 6,000 teammates have participated and nearly 2,000 ideas have been implemented to improve client and employee experiences based on this feedback, leading to instrumental changes, such as:

- Reducing the number of systems used across Key, and implementing numerous system enhancements
- Launching a resource center with enhanced procedures for Retail, Contact Center, and Fraud teammates
- Providing more robust support around our branch lobby closure and reopening strategy during the pandemic
- Instituting the availability of e-signatures for account openings

The VoE Forum has served as a critical cornerstone for teammate support through the global pandemic, providing a direct line of communication between our employees and leadership.

To enhance how Key collects, manages, and shares teammate ideas, the VoE Forum transitioned to a new platform in January 2022. The new platform improves the experiences of those who share and act on the ideas raised in the VoE Forum, empowering teammates to better collaborate on solution-building to create a stronger, better Key.

With the new platform, Key can regularly position new topics or questions identified as areas of opportunity. Teammates collaborate by sharing ideas, votes, or comments.

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\(^1\)EasyUp is a service that automatically saves a set amount from every debit card purchase to a KeyBank savings account.
Retention and turnover

Key is proud to employ a diverse workforce of talented teammates who personify our core values and reflect the diversity of the clients and communities we serve. Who we hire and promote shapes who we are as an organization. We intentionally and actively seek candidates from diverse backgrounds and offer a range of programs to attract and retain top talent. We invest significant time and resources in creating an attractive work environment and rewards package that retains our teammates. These efforts are succeeding, as evidenced by the long-standing tenure of our workforce. We are proud that 24% of our employees have been with us for more than 15 years.

Key’s annualized rate for voluntary turnover¹ for year-end 2021 was 18.4%, nearly equal to our pre-pandemic turnover rate in 2019 of 18.6%.² This relatively flat rate indicates we are not experiencing the turnover spikes others are experiencing as a result of the post-pandemic phenomenon being referred to as the “great resignation.” Our focus on improving the employee experience through measures such as career development opportunities, financial resources, wellness support, and flexible work arrangements contributed to retaining valuable teammates in 2020 and 2021.

In evaluating the success of our retention efforts, we consider factors such as representation, position, tenure, and performance. While the table below breaks out turnover rates for different populations within our workforce, we realize that an individual’s decision to remain at Key, or to leave Key, is based on a variety of professional and personal factors. Compared to the pre-pandemic rate in 2019, turnover was down across several key demographics, including females, people of color, and high performers. The turnover rate for females and males was relatively equal at 18.4% in 2021. Our efforts to retain high performers effectively kept turnover to a minimum at 6.3% for year-end 2021; this is a notable drop from 7.4% in 2019, before the pandemic started.

Voluntary Turnover Annualized Rate, 2017 – 2021

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<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Female</td>
<td>18.4%</td>
<td>13.0%</td>
<td>18.9%</td>
<td>16.0%</td>
<td>18.4%</td>
</tr>
<tr>
<td>Male</td>
<td>18.4%</td>
<td>12.2%</td>
<td>18.0%</td>
<td>17.0%</td>
<td>17.1%</td>
</tr>
<tr>
<td>People of Color</td>
<td>23.7%</td>
<td>16.9%</td>
<td>24.2%</td>
<td>21.1%</td>
<td>24.1%</td>
</tr>
<tr>
<td>White</td>
<td>16.9%</td>
<td>11.5%</td>
<td>17.1%</td>
<td>15.2%</td>
<td>16.3%</td>
</tr>
<tr>
<td>High Performer³</td>
<td>6.3%</td>
<td>3.9%</td>
<td>7.4%</td>
<td>6.0%</td>
<td>6.4%</td>
</tr>
</tbody>
</table>

¹Voluntary turnover annualized rate excludes interns and contractors. ²Since turnover was at a five-year low in 2020 (during the pandemic) across all demographic categories, roles, and job grades, we don’t believe it provides an accurate year-over-year comparison. ³A high performer is defined as an individual who receives a rating of 5 (out of 5) in their performance evaluation.
Investing in our teammates

Investing in career development is critical to keeping great talent.

Key offers teammates several resources to support their career journeys:

<table>
<thead>
<tr>
<th>Development Planning Resources</th>
<th>Aspiring Manager and Manager curriculums</th>
<th>Keys2Learn</th>
<th>MentorMe at Key Program</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Grow at Key</td>
<td>HRO Career Development page</td>
<td>180/360 Development Feedback Assessments</td>
</tr>
</tbody>
</table>

In 2021, we invested over $12.5 million in our teammates’ growth and development through formal learning opportunities, career development tools, resources, and our tuition reimbursement program. In addition to on-the-job training and career development opportunities, our teammates participated in over 580,000 hours of formal learning programs and courses throughout 2021. More than 6% of these hours were dedicated to learning new skills to prepare our teammates for the future of work, such as emerging technologies, leadership, new processes, and new ways of working.

Career development planning

Key encourages all teammates to complete a career assessment and create and document a development plan in our career development portal, Grow at Key.

Grow at Key provides teammates with robust development tools, assessments, learning paths, detailed reports, and more to help them achieve their career goals at Key. It empowers teammates to take ownership of their career path and development, while providing managers with insights to enhance coaching.

Since Key Technology Operations and Services (KTOS) introduced the Future Ready Career Investment, we’ve witnessed an increase in noncompliance training participation each year. During the first half of 2018, 25% of full-time KTOS employees had participated in noncompliance training. During the same timeframe in 2021, 80% of full-time KTOS employees had participated in noncompliance training.

MentorMe at Key

Throughout the global pandemic, virtual mentoring – both formal and informal – provided an outlet for connection, networking, and engagement, when many teammates continued to work remotely. MentorMe at Key is a robust program with many opportunities for teammates to develop coaching skills, meet team members from across the organization, learn something new, and actively support our diversity, equity, and inclusion initiatives.

Over the past five years, the program has grown from an idea to a catalyst for change – influencing relationships, impacting career paths, and delivering business results for Key.

In 2021, the MentorMe at Key program continued to attract more participants – a testament to its effectiveness and importance.

2021 MentorMe at Key highlights:

- 1,616 individuals enrolled
- 613 individuals matched (increased 45% from 2020)
- 2,292 mentoring hours logged (increased 66% from 2020)
- 36% intercultural mentoring pairs
- 63% of matches across lines of business
Intern and analyst programs

Key is dedicated to training and developing the next generation of banking professionals. Our internship programs offer in-depth, hands-on, mentored experiences that provide students with valuable career experiences. Programs are offered at both the retail branch and enterprise level.

For most students, an enterprise internship with Key leads to an analyst position after graduation. Our intern-to-analyst offers, and offer acceptance rates, exceed external benchmarks.

2021 enterprise intern program:

- 181 enterprise interns, representing 75 universities and 35 different majors across 26 states
- More than half of the group (55%) qualified as diverse: 14% POC females, 16% POC males, and 25% White females
- 81% of enterprise interns were offered positions – a combination of full-time and returning internship opportunities

2021 enterprise analyst program:

- 129 enterprise analysts
- More than half of the group (51%) qualified as diverse: 10% POC females, 16% POC males, and 26% White females

2021 retail intern program:

- 124 retail interns joined Key teammates in our branches
- More than half of the intern class (55%) qualified as diverse: 11% POC females, 15% POC males, and 28% White females
Teammate volunteerism

Giving back to communities is central to who we are. Teammates across the enterprise generously gave their time and talent by serving their neighbors and neighborhoods throughout 2021.

**Neighbors Make the Difference Day®**

Our annual Neighbors Make the Difference Day — a designated day for employee volunteerism — first launched in 1991. It is the hallmark of Key’s commitment to its communities and a leading corporate volunteerism effort in America.

In 2021, more than 4,100 teammates participated in volunteer efforts, contributing to more than 600 projects in 35 cities.

**United Way campaign**

Over the past 12 years, Key and our teammates have contributed more than $41 million to United Way throughout the United States. Supporting the United Way brings to life our collective commitment to our neighbors and neighborhoods.

**Impact:**

- Employee pledging: $2,065,426
- Employee participation: 39%

**Harvest for Hunger campaign**

We held our first-ever virtual campaign to support Harvest for Hunger, a program of the Greater Cleveland Food Bank.

**Impact:**

- 100 teammates made contributions totaling $17,082, of which $14,764 was matched by KeyBank Foundation for a total of $31,845
- Additional funds of roughly $700 were raised through online sales of gift certificates, pasta, and flowers

**Earth Day challenge**

Our Earth Day challenge took place during the month of April, during which we encouraged teammates to take action to better our planet.

**Impact:**

- More than 440 teammates participated, logging more than 4,000 volunteer hours
- 1,851 sustainable projects completed

**580**

**TEAMMATES**

served on 426 nonprofit boards, volunteering more than 3,200 hours

**23,650+**

**HOURS**

volunteered by teammates for other service, including our annual Neighbors Make the Difference Day

**26,860+**

**TOTAL**

teammate volunteer hours in our communities
Accountability, integrity, leadership, respect, and teamwork are core values at Key, driving our daily actions and decisions. We hold ourselves – and the third-party suppliers with whom we work – to high standards of corporate governance and ethical business practices. Our culture of continuous improvement and strong risk management are strategic priorities. We continuously invest in new tools, technology, and processes that enable us to better manage the changing risk environment, from data security to anti-money laundering to evolving regulations.
Key is committed to meeting high standards of corporate governance, ethical behavior, and business conduct. Our corporate governance practices are long-standing strengths of our company.

We benefit from our Board’s tremendous experience, independent leadership, diverse expertise, and commitment to Key. Independent leadership and oversight responsibilities are driven through our robust independent lead director role, independent Board committee chairs, and the full involvement of each of our independent directors. All director nominees for election at the 2022 Annual Meeting of Shareholders, other than Chris Gorman, are independent under the New York Stock Exchange’s and KeyCorp’s standards of independence. Our standing Board committees (Audit, Compensation and Organization, Nominating and Corporate Governance, Risk, and Technology) consist solely of independent directors.

When searching for new directors, the Board considers whether the candidate would enhance the diversity of the Board in terms of gender, race, experience, and/or geography. The Nominating and Corporate Governance Committee (NCGC) utilizes a matrix approach that tracks each director’s and director nominee’s qualities and qualifications to assist the committee in maintaining a well-rounded, diverse, and effective Board.

Our Board is actively involved in the oversight of our strategies and in holding management accountable, both for the current year and long-term performance of our company. They are focused on and dedicated to ensuring we execute in a manner that is aligned with shareholder expectations. Each year, the NCGC, led by the lead independent director, conducts a thorough evaluation process to assess the effectiveness of each of our directors.

The Nominating and Corporate Governance Committee of the Board oversees KeyCorp’s policies and practices on significant issues of corporate social responsibility, including ESG and sustainability; community and government relations; charitable and political contributions; community development; Community Reinvestment Act activities; and fair and responsible treatment of clients.

Key also has a strong Executive Leadership team that brings a wide breadth of knowledge and experience to the organization. The diversity of our team, coupled with extensive industry expertise has driven sound, profitable growth at Key. The team is dedicated to holding one another accountable while delivering on our commitments and maximizing long-term value.

Additional information about KeyCorp’s Board of Directors can be found in the latest proxy statement.
A MESSAGE
FROM THE BOARD
OF DIRECTORS

We are pleased to share with you Key’s continued environmental, social, and governance progress. We remain committed to doing business fairly and responsibly and to advancing environmental, social responsibility, and governance efforts and outcomes.

Key made significant progress on our ESG journey in 2021. Based on feedback from our stakeholders, we updated our ESG focus areas to include: diversity, equity, and inclusion; financial inclusion; climate stewardship; and data privacy and security. These updated areas of focus align with our long-standing and well recognized commitment to economic access and diversity, equity, and inclusion while remaining a national leader in both affordable housing and renewable energy financing.

In 2021, Key also significantly expanded our ESG disclosures to provide more decision-useful information. We expanded our ESG Report, issued our inaugural Taskforce for Climate Related Financial Disclosures report and Sustainability Accounting Standards Board index, and continued disclosure through the Global Reporting Initiative and CDP.

Our Board’s Nominating and Corporate Governance Committee is responsible for overseeing ESG matters and is committed to our progress. The Committee focuses on our ESG practices and reporting with respect to environmental topics as well as resourcing, tracking, and progress of other responsible banking initiatives.

We recognize our role in ensuring that ESG risks and opportunities are integrated into long-term strategy; that the company is measuring and monitoring progress against commitments set as part of the strategy; and that ESG risks are well managed. For the second year in a row, ESG was a featured topic at our annual Board of Directors’ education day. We have leveraged industry experts to share best practices and ‘outside-in’ views of our progress and opportunities, which have been formative to our priorities and path ahead. In early 2022, we are updating Board committee charters to include certain ESG matters, reflecting a more contemporary structure for governance.

In 2022, we are committed to continuing our progress, with specific focus on our ESG priorities. We will also continue to monitor ESG trends across the industry and evaluate how those trends apply to Key. We are proud of our enhanced climate and community commitments and recognize the significant work ahead to deliver the outcomes we aspire to achieve. We look forward to sharing our progress.

Thank you for your interest in our efforts to support thriving communities and a more sustainable environment.
Board responsibility for risk management

Like all financial services companies, we engage in business activities and assume the related risks. The most significant risks we face are credit, compliance, operational, liquidity, market, reputation, strategic, and model risks.

Our Board of Directors approves the Enterprise Risk Management (ERM) Policy and sets the overall level of risk KeyCorp is willing to accept and manage in pursuit of our strategic objectives. The ERM Policy encompasses our risk philosophy, policy framework, and governance structure for the management of risks across the company. The Risk Appetite Statement, which is included in our ERM Policy, describes the industries with which Key will not do business, including for socially responsible purposes. The policy also ensures effective oversight is in place for managing risks, enabling regular review and challenge. The Risk Committee of the Board oversees KeyCorp’s risk management program and is responsible for strategies, policies, procedures, and practices relating to the assessment and management of the corporation’s enterprise-wide risk, including risks related to capital adequacy, capital planning, and capital actions.

The ERM Committee is chaired by the CEO and is comprised of other executive officers including the Chief Risk Officer. This management committee meets regularly and is central to ensuring that the corporate risk profile is managed in a manner consistent with KeyCorp’s risk appetite. The Committee supports the management of all risks by providing governance, direction, oversight, and high-level management of risk.

KeyCorp Risk Governance Committee structure

The table below depicts our risk management hierarchy and associated responsibilities and activities of each group.
Managing risk at Key

Key remains disciplined in managing our risk and capital. We have maintained our moderate risk profile, including strong underwriting standards, and we have taken steps to position the company to perform through any business cycle.

To further align with the moderate risk appetite, Key employs “three lines of defense” for risk governance.

- The lines of business are responsible for acting as the “first line of defense” with primary responsibility to accept, own, and proactively identify, monitor, and manage risk.

- Risk Management, which acts as independent centralized oversight, is the “second line of defense,” aggregating, analyzing, and reporting risk information, and driving the establishment of risk policies reflective of Key’s risk appetite.

- The “third line of defense” is Risk Review, which provides independent assessment and testing of the effectiveness, appropriateness, and adherence to risk management policies, practices, and controls.

The three lines are balanced in importance and stature, and they must all operate effectively across the enterprise to sustain strong risk management. Risk appetite is considered as strategic alternatives are evaluated, performance objectives are established, and mechanisms are strengthened to manage risks.

Key maintains a strong risk culture through proactive risk management activities integrated into business processes as well as employee risk awareness training.
Key maintains the highest standards of ethical behavior throughout our operations. Our Code of Business Conduct and Ethics (the Code) is critical to how we fulfill our purpose and create the type of environment we promise to our employees. Our five core values – teamwork, respect, accountability, integrity, and leadership – guide and inspire our daily actions (these are explained in more detail on page 6). Together, the Code and our values reinforce our responsibility to make good choices and to act according to the highest professional and ethical standards in everything we do.

**Employee Promise**

Our Employee Promise defines who we are as a company. It describes the partnership between Key teammates and how we create an environment where our teammates, our clients, and our communities thrive. We do this by providing smart solutions and great service to help our clients make confident financial decisions.

- We have a strong sense of community.
- We have the opportunity for personal growth.
- We do work that matters.
- We are accountable, and our results are rewarded.

**Business conduct**

The Chief Ethics Officer leads Key’s Corporate Ethics Office, which is responsible for the administration of the Code, Key’s ethics program, and oversight of conduct investigations. The ethics program is designed to deter and detect unethical or illegal employee conduct and to provide guidance and review of outside business and professional activities. The Code is the foundation for the ethics program. We continually monitor the efficacy of the ethics program, including quarterly risk and control testing. These results are reported to the Risk Culture, Conduct, and Ethics Committee as well as the Audit Committee of the Board.

The Code is our first resource for guidance when making decisions in the course of our duties. In addition, Key has other Human Resources and line of business policies and standards that set expectations for behavior, including Key’s Professional Conduct Policy.

Each teammate and member of our Board of Directors is responsible for understanding, adopting, and upholding all principles and requirements within the Code and protecting and maintaining Key’s reputation. The Code is reviewed annually and updated to ensure coverage of new ethical issues that arise. Teammates and directors are required to successfully complete ethics training and certify their understanding of the Code. At the end of 2021, 97%¹ of employees and 100% of directors completed this requirement. Being ethical is part of living our Key values.

¹Our goal is for 95% of employees to complete annual Code training, this allows us to accommodate new hires and employees who may be on inactive status due to leave.
Key's employees and Board of Directors are obligated to both comply with the Code and to speak up when they suspect or witness a potential violation of the Code. Individuals can report concerns to a code of ethics officer, contact the Ethics Office, call the Key ethics helpline, or complete an online form on Key’s intranet or from their personal computer.

### Code of ethics officer

Each line of business and support area has a dedicated code of ethics officer who is specially trained to respond professionally and as confidentially as possible to ethics and other potential violations.

The dedicated code of ethics officer is an expert for any Code-related questions (either general or specific), such as those concerning limits on gifts and entertainment, running for political office, or other business-related ethical concerns.

Key’s ethics helpline is available toll-free 24 hours a day, seven days a week. The ethics helpline allows teammates to report a possible Code violation without necessarily revealing their identity, if they choose to remain anonymous.

### Business ethics

#### Non-retaliation

Key is committed to supporting and sustaining the integrity of our company. Employees are required to speak up if they suspect any unethical activity or behavior at Key. We do not permit any retaliation against employees for reports of suspicious activity made in good faith. Confidentiality is a cornerstone to all investigations of employee misconduct. In the event misconduct is found to have occurred, employees may be subject to consequences ranging from performance improvement plans to termination.

#### Anti-competitive activities

We are obligated to comply with all applicable country, federal, state, and local laws, rules, and regulations. This includes all applicable competition and antitrust laws and regulations.

#### Anti-bribery and anti-corruption

Key’s anti-bribery policy is codified in the Code, which prohibits employees, directors, service providers, and agents acting on Key’s behalf from engaging in bribery or corruption of any kind. Anti-bribery and corruption training is provided through the annual Code training. We are committed to compliance with all applicable anti-bribery and anti-corruption laws, including, but not limited to, the U.S. Bank Bribery Act and the Foreign Corrupt Practices Act. Typically, bribes are offered or given to obtain an illegal benefit or advantage and often take the form of excessive gifts or entertainment. Key’s public entities policy strictly prohibits gifts and entertainment for public officials unless prior approval is received. If employees are offered or receive something of value from a client or third-party service provider outside of the allowable limits of the Code, it must be disclosed to the Ethics Office in a timely manner. The Ethics Office administers an internal monitoring system designed to detect corruption and conducts a comprehensive bribery and corruption risk assessment every 18 months.
KeyCorp fully supports the U.S. federal government’s efforts to combat terrorism and money laundering.

Key maintains a program of financial crimes governance policies, procedures, and guidelines specifically designed to comply with all U.S. anti-money laundering (AML) and counter-terrorist financing laws. These policies, procedures, and guidelines apply equally to both Key’s domestic operations and international activity. Key’s policies are designed to reduce the likelihood that the corporation, any subsidiary, or any employee will become the victim of, or unknowingly participate in any illegal activity. These policies help fight terrorism and money laundering and protect customers from losses from fraud and other illegal activity.

Key’s financial crimes governance policy is reviewed and approved annually by the KeyCorp Board of Directors and the Risk Committee of the KeyCorp Board of Directors. Key also maintains an anti-corruption compliance program, including a Foreign Corrupt Practices Act policy and Code of Business Conduct and Ethics.

As part of its AML program, Key maintains reasonable procedures to determine the identity of each prospective customer and ascertain whether they are on the Office of Foreign Assets Control (OFAC) list or a similar list provided by a U.S. governmental or regulatory body prior to initiating a business relationship. Key maintains record retention policies compliant with applicable laws. In addition, Key performs risk-based customer due diligence in order to assist Key in the identification of potentially high-risk customers.

KeyBank’s customer due diligence program includes, but is not limited to, the following:

- Establishment and maintenance of written procedures that are reasonably designed to identify and verify beneficial owners of legal entity customers, as mandated by federal regulations, as well as collection of beneficial ownership at lower equity thresholds for higher risk customers and periodic screening of all beneficial owners for OFAC and Political Exposure

- Policies and procedures covering relationships with senior foreign political figures, their family, and close associates (collectively, PEPs), and PEP screening of Key’s customer base using a risk-based methodology

- Risk-rating of the customer base

- Collection of documents, such as the customer’s AML program and business license, as applicable, and other due diligence information using a risk-based methodology

- Ongoing/periodic enhanced due diligence, including transaction review and negative media screening for high-risk customers

- Certain high-risk customer types, such as PEPs, Money Services Businesses, and Foreign Correspondent Banks, are subject to approval of the chief anti-money laundering officer

- Policies prohibiting accounts/relationships with certain customer/business types, including but not limited to, shell banks and Payable Through Accounts to foreign financial institution customers

Key also has implemented other reasonable controls, including monitoring of our customer base and their transactions to aid in the identification of potentially suspicious activity. Key requires AML training at onboarding for new employees and annual AML training for employees, directors, and applicable third parties. An annual independent testing review is conducted of Key’s AML program. Key’s AML program applies a risk-based approach to all activities and operations.

Key takes its regulatory obligations seriously and is committed to meeting all applicable compliance requirements.
DATA PRIVACY AND SECURITY

Data privacy and security at Key

Keeping the personal and financial information of our clients and employees, as well as other individuals with whom we come into contact, protected and secure is one of Key’s highest priorities. Strong data safeguards and controls, in conjunction with continuous monitoring of the threat landscape, helps protect the security and privacy of the information entrusted to Key. As the information security threat landscape continues to evolve, we will remain focused on our ability to align with industry standards to protect information, use it lawfully, and manage any threats or incidents as they arise.

Our information security and privacy programs are continuously maturing. We make ongoing investments in technology and solutions to enable us to better manage the evolving regulatory and security environment.

Critical information security initiatives include:

• Strengthening authentication methods to make it easier and safer for clients to open and access Key accounts, while making it more difficult for bad actors to gain access

• Strengthening fraud monitoring processes through system integrations, automation, and additional fraud alerting and reporting capabilities

• Ongoing extension of security controls into the public cloud as Key continues to expand its footprint

• Maturing security hygiene and resiliency processes to mitigate workforce risks, such as access control and governance, privileged access management, remote workforce, insider threat, and phishing

Key’s security and privacy controls are regularly reviewed to align with industry standard practices, evolving laws, and changing client expectations.

Information security governance and oversight

Our Chief Information Security Officer and Enterprise Security Services Director regularly reports to Board-appointed committees on the status of Key’s information security program. The Technology Committee of the Board is responsible for approval of the enterprise’s technology strategic plan, including cybersecurity technology. Risk management issues are escalated to the Risk Committee of the Board. The Risk Committee is the approving body for our Information Security Policy and provides oversight in its development and execution. Additional details about our risk governance structure can be found on page 61.

Cybersecurity audits and assessments

We regularly conduct internal and external penetration tests of our environment and maintain a robust third-party security program to affirm our cybersecurity posture. We benchmark ourselves at least annually against industry leading frameworks, including, but not limited to, the National Institute of Standards and Technology, Cybersecurity Framework, and the Cyber Risk Institute Profile. Lessons learned from these audits and assessments are used to mature our program.

Key is subject to cybersecurity and privacy regulatory exams, as required by law for financial institutions operating in the U.S.
Key’s Risk Review Group conducts independent internal audits of our lines of business, operations, information systems, and technologies. Internal audits provide an independent perspective on Key’s processes and risks by using a systematic, disciplined approach to evaluate, test, and improve the effectiveness of risk management, control, and governance processes. A risk-driven process is used to assess significant categories of risk. Technology risks are evaluated in areas including cyber and information security, data control, acquisition and development, delivery and support, business continuity, and information technology governance. Results of internal audits are shared with line of business management, Key’s Operational and Compliance Risk Management groups, Key’s Audit Committee, and banking regulators to provide an adequate level of transparency. Any identified gaps are rated, issued a due date for remediation, and tracked through completion of remediation. Remediation is verified by the Risk Review Group.

Incident management

When an incident is identified, we follow established processes in our enterprise privacy and cyber incident response plan, which is a supplement to our corporate incident response plans. It provides a framework to enable the Enterprise Cyber Response team to effectively recover operations in the event of a cyberattack and to effectively manage incidents impacting bank information, including our clients’ and employees’ information.

Our Core Incident Response Rapid Emergency Assessment and Coordination Team (Core IR REACT) is responsible for responding to incidents, including cyberattacks, performing a preliminary assessment, and engaging additional support team members as necessary. The Core IR REACT team is a multidisciplinary team that is empowered to escalate issues, as appropriate, to our Crisis Management Team (CMT), which includes the CEO and the most senior executives from Key’s lines of businesses and major support areas. The CMT provides overall strategic direction for incident response and recovery.

We have processes in place to assess the potential impact of incidents on individuals and adhere to applicable laws, including notifying impacted individuals.

How Key safeguards client data and information:

- **Robust security for online accounts:** We leverage advanced data protection, strong encryption, and continuous monitoring to protect our clients’ accounts.

- **Online banking security:** Our online banking has strong sign-on requirements to protect clients’ sensitive information.

- **Security alerts:** To help protect financial accounts, we regularly share alerts about security and fraud with clients.

Data privacy

Key uses and maintains data lawfully and abides by data privacy standards. Key’s Privacy Policy governs the lawful processing of personally identifiable information across our entire organization, including our affiliates and subsidiaries. It encompasses the complete life cycle of data including collecting, obtaining, using, sharing, selling, accessing, protecting, handling, retaining, and destroying data.

All employees and third parties, including contractors, consultants, suppliers, and service providers, are expected to adhere to our Privacy Policy. Employees and contractors are required to complete an annual training course focused on protecting Key’s assets, which addresses security, privacy, and a range of other topics.

Privacy governance and oversight

Key’s dedicated Privacy team is led by our Chief Privacy Officer (CPO). The Privacy team is part of the broader Compliance team, which reports into the Compliance Risk Committee (CRC). The CRC reports to the Board’s Enterprise Risk Management Committee. Our CPO plays an active role on our governance committees. The CPO and Privacy team have the power to escalate privacy risks up through the Board. Additional details about Key’s risk governance structure can be found on page 61.

The Privacy and Cybersecurity teams work closely together to implement appropriate controls around how personally identifiable information is managed and protected, and to keep Key in compliance with applicable laws and regulations.
Privacy information usage and sharing

Our online privacy statement explains how we maintain the privacy and security of personally identifiable information (PII). It details how we collect, use, share, and safeguard information and also explains the privacy rights afforded to individuals under applicable laws. Embedded in this statement is our privacy notice to consumers.

Key’s privacy notice for consumers describes how we collect and protect PII about our clients, the type of information we share with others, and why. It also explains how clients can limit certain types of information sharing. Key does not sell PII and only shares this information with contracted third parties that assist us in servicing accounts and to facilitate our banking relationships with our clients and employees or as otherwise required by law.

Our privacy practices adhere to applicable state and federal privacy laws and regulations for financial institutions.

Privacy and security training and education

Key remains focused on providing information security and privacy education to our employees, clients, and the communities we serve.

Teammate engagement

Key executes on robust cybersecurity, privacy, and fraud education and awareness programs to ensure teammates are aware of how to identify and report cybersecurity and privacy concerns. Throughout the year, we provide ongoing education and awareness campaigns for teammates that focus on topics such as reporting a suspected cybersecurity threat, phishing and social engineering threats, pandemic-related scams, identity theft, and remote work security best practices. These campaigns are communicated through emails, company intranet articles, webinars, and “lunch and learn” sessions. All employees participate in mandatory enterprise-wide cybersecurity, privacy, and fraud training on an annual basis.

Client engagement

Client security is top of mind for Key. We provide clients with information and standard industry practices to keep individuals and businesses safe in a digital world. We encourage clients to report suspected fraudulent activity and suspicious emails via our dedicated phone line and email address. Throughout 2021, we held more than 30 education and awareness campaigns for clients that focused on topics such as cybersecurity and privacy best practices, identifying and reporting account takeover and fraud scams, keeping your business safe and secure from threats such as ransomware, business email compromise, and social engineering. Campaigns were promoted through emails, social media posts, alerts, and information on Key’s website, newsletters, and webinars.

Community engagement

Key engaged with secondary schools, colleges, and universities to provide cybersecurity education and awareness and promote technology and cybersecurity careers. We participated in numerous career day events at local high schools, providing information on the importance of keeping PII secure and promoting careers in cybersecurity. We hosted nine cybersecurity interns from various colleges and universities in 2021, providing them with the opportunity to work and learn about multiple aspects of cybersecurity in a hands-on environment.
POLITICAL INVOLVEMENT AND ACTIVITY

Corporate political activity principles statement

For the second year in a row, KeyCorp was distinguished as a Trendsetter for our political policies and related disclosures by the CPA-Zicklin Index of Corporate Political Disclosure and Accountability.

An important part of Key’s commitment to our communities includes active participation in public policy advocacy and the political process. While corporations and national banks are limited or prohibited by law from making political contributions, we believe it’s critically important to take a constructive role in the political process that will shape the future of our industry and its impact on our communities. Based on this premise, KeyCorp, through our Government Relations department, seeks to: 1) conduct political activity in accordance with all laws and regulations; 2) follow approved policies and procedures monitored by our Law Group and Compliance department; and 3) clear potential conflict provisions within our Code of Business Conduct and Ethics overseen by our Chief Ethics Officer.

Board of Directors oversight

The Nominating and Corporate Governance Committee of KeyCorp’s Board of Directors meets annually with a member of Key’s Government Relations team to review Key’s policies and practices regarding political contributions. Policies and practices reviewed by the Committee include: Key’s policies regarding doing business with public entities; the Government Relations preapproval process for ballot issue support; substantive changes to regulations, if any, affecting Key’s sponsored separate segregated funds; corporate political activity; and confirming that Key does not contribute corporate funds to candidate campaigns for election.

Key’s Government Relations program utilizes in-house government relations professionals and contract lobbyists to advocate on our behalf. Key complies with lobbying and disclosure laws. Our reportable federal lobbying expenditures for 2021 totaled $830,000.

$830K
REPORTABLE FEDERAL
lobbying expenditures
for 2021
Trade association membership

KeyCorp is a member of several industry trade associations at the national, state, and local levels. These organizations support initiatives that align with our commitment to our communities, which include initiatives that would make a positive impact on our ability to do business, spur economic growth, and enhance the quality of life in the communities we serve including diverse, equitable, and inclusive policies.

These associations work to develop industry consensus and advocacy, enabling us to reach government officials more efficiently and in a coordinated manner with peers in the financial services industry.

Corporate political spending

KeyCorp does not contribute corporate funds for election campaigns. This includes prohibiting supporting candidate committees, political parties or committees, or political committees organized for the advancement of political candidates, to Super PACs, or the making of independent political expenditures.

Key may make contributions in support of certain ballot issues. These issues support the interests of our businesses, our employees, and/or our communities. Ballot issue requests are reviewed by Key’s Law Group and then submitted to the executive leader of Key’s Corporate Center for final approval. Contributions for approved ballot issues are reviewed annually by the Nominating and Corporate Governance Committee of the Board of Directors and are disclosed semi-annually on the ESG Information - Corporate Governance page of key.com.

Political action committees

Eligible officers, managers, and professional employees of KeyCorp can voluntarily participate in the political process by making an individual contribution to the political action committee (PAC) sponsored by KeyCorp.

Information regarding contributions by the KeyCorp Advocates Fund and the KeyCorp Advocates Fund – Federal is publicly disclosed and accessible at fec.gov.

Information for the KeyCorp Advocates Fund – New York can be found at elections.ny.gov.
ESG AT KEY – GOING FORWARD

Over the course of 2021, I had the opportunity to meet with more than 200 community organizations across Key’s footprint. I was inspired by the incredible work of so many who dedicate their lives to lift up neighbors and neighborhoods, give countless hours to helping communities thrive, and provide resources to those who need them most. I heard stories of dreams achieved – diplomas, first homes, and newly minted entrepreneurs.

I also heard of dreams unfulfilled or even worse, simply not dared to be dreamt. One thing is clear, the list of needs in our communities is as great as it has ever been.

At Key, we’re proud to stand with our clients and communities, working shoulder to shoulder to see even more dreams achieved. We’re also proud to sharpen our focus on climate stewardship to ensure a world where dreaming is possible for generations to come.

But dreams are not enough.

At Key, we are committed to action.

In 2022, we will focus relentlessly on our ESG priorities of diversity, equity, and inclusion; financial inclusion; climate stewardship; and data privacy and security. We will enhance existing initiatives and develop new programs to increase impact and outcomes. We are investing in new capabilities to capture and share robust data and further expand our disclosures.

In 2022, we’ll accelerate our investments in affordable housing, mortgage and small business lending in low- and moderate-income communities, and transformative philanthropy through our National Community Benefits Plan. We’ll focus on building even stronger community partnerships by working with organizations to intensify local impact.

We have accelerated and expanded our commitments to carbon neutrality and sustainable finance, and we are baselining financed emissions to develop robust plans and a clear path to net zero. We continue to build internal knowledge and awareness of climate risks and opportunities and we will complete our work to identify and quantify climate-related risks through scenario analysis.

We will continue to share our progress through transparent disclosure and hold ourselves accountable to positive outcomes for all stakeholders. We will continue to support our clients and communities with expertise, new products, and new capabilities in their transition to an inclusive, equitable, and low-carbon economy.

And while there is much work to do, we have a legacy of doing business the right way for the right reasons. We have strong momentum with a culture deeply committed to ESG and a business model that defines success not only based on dollars, but on creating shared value for all stakeholders.

All the best,

Eric M. Fiala
Head of Corporate Responsibility and Community Relations
Appendix

ORGANIZATIONAL CHANGES

JAMES L. WATERS
General Counsel and Corporate Secretary of KeyCorp

James Waters joined Key as General Counsel and Corporate Secretary and is a member of the Executive Leadership team. James leads Key’s Law Group and serves as the company’s senior legal officer and has more than 20 years of experience in corporate law with a focus on finance.

HELENA HAYNES-CARTER
Chief Diversity, Equity, and Inclusion Officer

Helena Haynes-Carter joined Key as Chief Diversity, Equity, and Inclusion Officer to lead Key’s award-winning DE&I efforts and oversee the strategy and tactics to improve the acquisition, development, and retention of diverse talent and suppliers. Helena joins Key with executive experience spanning the healthcare, financial services, energy, and public sector industries.

JENNIFER EASTES
Head of Environmental, Social, and Governance

Jennifer Eastes joined Key as Head of Environmental, Social, and Governance and leads the development and execution of Key’s ESG strategy, including operationalizing our ESG programs, expanding our ESG disclosures, and enhancing our brand and reputation as a responsible bank and corporate citizen. Jennifer has 16 years of experience working with companies to develop their corporate sustainability strategies.
ORGANIZATIONAL CHANGES (continued)

JASON CWIKLINSKI
Head of Supplier Diversity

Jason Cwiklinski was promoted to Head of Supplier Diversity to lead and execute Key’s supplier diversity strategy. Jason will focus on aligning our line of business and enterprise priorities and strengthening our connections to diverse businesses and communities. Jason is also a leader in our Champions for Persons with Disabilities KBING.

RALPH KELLY
Emerging Markets Segment Product Manager

Ralph Kelly was promoted to a new role, Emerging Markets Segment Product Manager, and works with members of Product Management, Consumer Payments, Community Development, and Home Lending, among others, to align products to meet LMI client needs, while ensuring a robust measurement infrastructure is in place to monitor progress with clients’ financial health.

ROB LIKES
Head of CDLI

Rob Likes joined the Commercial Bank leadership team under his current role as the Head of CDLI. Rob has been with Key for close to 17 years and his voice and insights have helped Key build one of the most valuable and durable sub-sectors in commercial real estate.
AWARDS AND RECOGNITION

14X
Best Places to Work for LGBT Equality
Human Rights Campaign

12X
Top 50 Companies for Diversity
DiversiInc

10X
Consecutive “Outstanding” CRA Ratings
Office of the Comptroller of the Currency

8X
Community-Minded Companies
The Civic 50 Points of Light

8X
Military Friendly Employer
G.I. Jobs

6X
Military Friendly Spouse Employer
G.I. Jobs

5X
Leading Disability Employer
National Organization on Disabilities

3X
Gender Equality Index
Bloomberg

7X
“Best of the Best” Top Employers
Black EOE Journal
Note Regarding Materiality and Forward-Looking Statements

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.

This document may contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements usually can be identified by the use of words such as "goal," “objective,” “plan,” “expect,” “assume,” “anticipate,” “intend,” “project,” “believe,” “estimate,” or other words of similar meaning. Forward-looking statements provide Key’s current expectations or forecasts of future events, circumstances, results, or aspirations. If underlying assumptions prove to be inaccurate or unknown risks or uncertainties arise, actual results could vary materially from these projections or expectations. Factors that could cause Key’s actual results to differ from those described in the statements can be found in KeyCorp’s Form 10-K for the year ended December 31, 2021, as well as in KeyCorp’s subsequent SEC filings, which have been filed with the Securities and Exchange Commission and are available on Key’s website www.key.com/ir and on the Securities and Exchange Commission’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.

KeyBanc Capital Markets is a trade name under which corporate and investment banking products and services of KeyCorp and its subsidiaries, KeyBanc Capital Markets Inc., Member FINRA/SIPC, and KeyBank National Association (“KeyBank N.A.”), are marketed. Securities products and services are offered by KeyBanc Capital Markets Inc. and its licensed securities representatives, who may also be employees of KeyBank N.A. Banking products and services are offered by KeyBank N.A.

Key Equipment Finance is a division of KeyBank.

All credit products are subject to collateral and/or credit approval, terms, conditions, availability and subject to change.