

Key Supplier Code of Conduct

About Key

KeyCorp is one of the nation's largest bank-based financial services companies. Its wholly owned national subsidiary, KeyBank, NA, provides deposit, lending, cash management, and other financial services to individuals and business esbusinesses through a branch network in 15 states and nationally through its key.com website. 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, syndications, and, derivatives, to middle market companies in selected industries throughout the United States under the KeyBanc Capital Markets trade name. KeyCorp or any of its associated entities shall be referenced as "Key" in this code of conduct.

Key values

At Key, our Supplier Code of Conduct is an extension of what we call our Key Values. Key Values are the principles we stand for as individuals and as a company. These principles play a vital role in defining Key and guiding decision-making and strategic planning. Key Values comprise the following attributes:

Teamwork — We work together to achieve shared objectives.

Respect — We value the unique talents, skills, and experience that our teammates bring.

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.

Key Supplier Code of Conduct

Key is committed to ethical business practices, and we hold our suppliers to the same high standards. Suppliers that provide goods and/or services to Key and its affiliates are expected at all times to conduct their business with honesty in fact and observe the highest commercial standards of fair dealing in the trade, avoiding actual or perceived conflicts of interest.

The provisions of the Key Supplier Code of Conduct describe expectations for our suppliers and are not intended to replace or modify the provisions of any legal agreement between a supplier and KeyBank or any of its affiliates. KeyBank also asks suppliers to hold their subcontractors to the same standards contained in this Code.

Human capital

- **Involuntary servitude**

Suppliers shall not use any form of slave, forced, bonded, indentured, or detention labor.

- **Supplier Code of Ethics**

Suppliers shall perform their work with the highest degree of ethical conduct and shall maintain a code of ethics that it shall require its employees to understand and follow.

- **Child labor**

Suppliers shall not employ or use underage labor in the production of their goods or services. Suppliers shall not employ anyone younger than 16, regardless of the country's minimum working age.

- **UN Declaration of Human Rights**

KeyBank expects its suppliers and their subcontractors to abide by the United Nations Universal Declaration of Human Rights.

- **Supplier Access and Inclusion**

Key is an institution with a strong culture of inclusion, helping us better connect with the broad range of clients and communities that we serve. Through the program, we engage in inclusive selection processes that include, among other things, informing potential suppliers about opportunities to contract with Key, providing broad access to supplier opportunities, and evaluating small local businesses where they meet the needs of Key's business. All selection decisions are based on legitimate, non-discriminatory business justifications, which can include, but are not limited to, total cost, quality, and experience.

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Business ethics

- **Fair and honest dealings**

Suppliers should have in place guidelines that prohibit employees from engaging in self-dealing and conflicts of interest among directors, officers, customers, employees, and subcontractors.

- **Reporting business ethics violations**

Suppliers may report ethics concerns to KeyBank's Ethics Helpline (administered by an independent third party) at **1-866-458-6194**, which is available toll-free 24 hours a day, seven days a week, or online at www.key.com/ethicshelpline.

- **Gifts and entertainment**

Suppliers may not offer or provide gifts or entertainment to Key employees or directors with the intent to influence or reward them in connection with any business or otherwise outside of the allowable limits within Key's Code of Business Conduct and Ethics found at <https://www.key.com/about/company-information/key-bank-public-notice.html>.

- **Improper/illegal payments**

Key suppliers and their subcontractors shall not engage in any activities involving bribes, kickbacks, or giving an appearance of impropriety.

- **Key Code of Business Conduct and Ethics**

Key employees are required to conduct every aspect of KeyBank's business in an honest, ethical, and legal manner. As a result, suppliers must not knowingly cause an employee to violate KeyBank's Code of Business Conduct and Ethics. Suppliers may familiarize themselves with Key's Code of Business Conduct and Ethics found at <https://www.key.com/about/company-information/key-bank-public-notice.html>.

Reporting concerns

- All Key Suppliers are required to report any suspected or known violations of this Code or Key's Code of Business Conduct and Ethics to Key through Key's reporting mechanism, the Ethics Helpline. Reports can be made by phone at **1-866-458-6194** or online at www.key.com/ethicshelpline. Reports can be made anonymously.

Operational Sustainability

- At Key, operational sustainability is focused on reducing energy and resource consumption, reducing greenhouse gas emissions, and managing waste responsibly across our footprint. We foster a workplace that reduces our environmental footprint and supports the health and well-being of our employees to deliver value to our clients and communities. Key requests that its suppliers support the sustainability efforts of Key through the services they perform as well as through their own corporate initiatives.
- Key considers operational sustainability important to delivering financial products, services, and solutions that create shareholder and community value. Key leverages internal expertise and industry-leading research and ratings to assess sustainability impact and performance. Suppliers can demonstrate a commitment to sustainability by:
 1. Proactively supporting Key's sustainability practices and bringing forward ideas for reducing the environmental impact of the products and services impacting Key's clients, stakeholders, employees, and communities
 2. Assessing sustainability within their supply chains and proactively managing priorities, including tracking and reporting items like:
 - Greenhouse gas (GHG) and other hazardous air emissions
 - Waste and hazardous substances
 - Water consumption
 - Natural resource usage, including packaging, paper, and pulp
 - Biodiversity and ecosystem conservation
 3. Work with their subcontractors and suppliers to measure and report on the environmental impact of the services and products being supplied to Key

Supplier conduct inquiries

Key may conduct reasonable inquiries of its suppliers to ensure compliance with this Code of Conduct.

