

**KeyBank National Association**

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United States of America

**Kimberly N. Lacey**  
Chief Anti-Money Laundering Officer  
Financial Crimes Governance

December 7, 2017

Corporate\_Compliance@keybank.com

Re: Detailed Statement of Compliance with AML Laws

To Whom It May Concern:

Please be advised that Key maintains a “Statement of Compliance with Anti-Money Laundering Laws” letter (“Letter”) on the KeyCorp Web site, <https://www.key.com/about/company-information/key-bank-public-notices.jsp> for public understanding of Key’s compliance with laws and regulations of the United States. Key’s statement of compliance with AML laws is not a certification for the purposes of reliance with the USA PATRIOT Act. We understand more pointed responses aligned to the Wolfsberg Group questions for financial institutions may be of interest. Key appreciates your acceptance of both the Letter and the following responses:

<b>I. General AML Policies, Procedures and Practices</b>	
• Does Key’s AML compliance program require approval of Key’s Board or senior committee?	Yes
• Does Key have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Yes
• Has Key developed written policies documenting the processes that are in place to prevent, detect and report suspicious transactions?	Yes
• In addition to inspections by Key’s primary regulator, does Key have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes
• Does Key have a policy prohibiting accounts/relationships with shell banks? <i>Note: A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.</i>	Yes
• Does Key have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Yes
• Does Key have policies covering relationships with politically exposed persons (PEPs), their family and close associates?	Yes
• Does Key have record retention procedures that comply with applicable law?	Yes
• Does Key require that its AML policies and practices be applied to all applicable branches and subsidiaries of Key both in the United States and in locations outside of the United States?	Yes

• Does Key have an Anti-Corruption Compliance Program, including a Foreign Corrupt Practices Act Policy and Code of Ethics?	Yes
<b>II. Risk Assessment</b>	
• Does Key have a risk-based assessment of its customer base and their transactions?	Yes
• Does Key determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that Key has reason to believe pose a heightened risk of illicit activities at or through Key?	Yes
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	
• Has Key implemented processes for the identification of those customers on whose behalf it maintains, operates accounts, or conducts transactions?	Yes
• Does Key have a requirement to collect information regarding its customers' business activities?	Yes
• Does Key assess Key customers' AML policies or practices?	Yes, based on the risks for certain customer types
• Does Key have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes
• Does Key have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes
• Does Key complete a risk-based assessment to understand the normal and expected transactions of Key customers?	Yes
• Does Key offer Due-To Payable Through Accounts to its foreign financial institution customers?	No
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	
• Does Key have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes
• Where cash transaction reporting is mandatory, does Key have procedures to identify transactions structured to avoid such obligations?	Yes
• Does Key screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes
• Does Key provide any correspondent banking or other services for banks or financial institutions domiciled or incorporated in Iran?	No
• Does Key have any presence/business operations/business dealings in Iran?	No

<ul style="list-style-type: none"> <li>Does Key have any customer (individuals or legal entities) that are related to the Government of Iran, Central Bank of Iran, any Financial Institutions in Iran, or any branch/subsidiary/person/entity owned or controlled by them?</li> </ul>	No
<ul style="list-style-type: none"> <li>Does Key have policies to reasonably ensure that Key only operates with correspondent banks that possess licenses to operate in their countries of origin?</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Does Key adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?</li> </ul>	Yes
<b>V. Transaction Monitoring</b>	
<ul style="list-style-type: none"> <li>Does Key have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?</li> </ul>	Yes
<b>VI. AML Training</b>	
<ul style="list-style-type: none"> <li>Does Key provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>Identification and reporting of transactions that must be reported to government authorities,</li> <li>Examples of different forms of money laundering involving Key's products and services, and</li> <li>Internal policies to prevent money laundering?</li> </ul> </li> </ul>	Yes
<ul style="list-style-type: none"> <li>Does Key retain records of its training sessions, including attendance records and relevant training materials used?</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Does Key communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Does Key employ third parties to carry out some of the functions of Key?</li> </ul>	Yes
<ul style="list-style-type: none"> <li>Does Key train third parties who perform some of the functions of identification and reporting of transactions that must be reported to government authorities?</li> </ul>	Yes, to the extent the third party is involved in performing transactions that have a government reporting requirement
<ul style="list-style-type: none"> <li>Does Key train third parties who perform some of the functions of Key through examples of different forms of money laundering involving Key's products and services?</li> </ul>	Yes, to the extent that the third party is involved with specific products and services

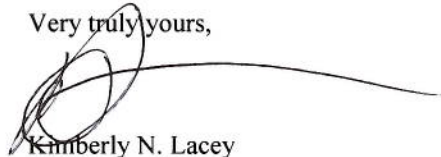
<ul style="list-style-type: none"> <li>• Does Key train third parties who perform some of the functions of Key to Key’s internal policies to prevent money laundering?</li> </ul>	<p>Yes, to the extent that AML/CTF Policies are relevant to the function the third party performs and are covered in the AML training materials</p>
<p><b>VII. Other information available on Key.com Web pages:</b></p>	
<ul style="list-style-type: none"> <li>• Information about Key’s Board of Directors and Executive Leadership may be found at: <ul style="list-style-type: none"> <li>○ <a href="https://www.key.com/about/company-information/executive-biographies.jsp">https://www.key.com/about/company-information/executive-biographies.jsp</a></li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Key posts other Public Notices at: <ul style="list-style-type: none"> <li>○ <a href="https://www.key.com/about/company-information/key-bank-public-notice.jsp">https://www.key.com/about/company-information/key-bank-public-notice.jsp</a></li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Key’s Annual Report and copies of other regulatory and financial documents are available at: <ul style="list-style-type: none"> <li>○ <a href="http://investor.key.com/GenPage.aspx?IID=100334&amp;GKP=208824">http://investor.key.com/GenPage.aspx?IID=100334&amp;GKP=208824</a></li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Press Releases from Key at: <ul style="list-style-type: none"> <li>○ <a href="http://investor.key.com/news.aspx?iid=100334">http://investor.key.com/news.aspx?iid=100334</a></li> </ul> </li> </ul>	

Key is a wholly owned subsidiary of KeyCorp, a publicly traded corporation listed on the New York Stock Exchange (“NYSE”) under the trading symbol KEY. Please note that the undersigned is the board designated anti-money laundering officer.

Key is a U.S. Withholding Agent and is fully compliant with FATCA in terms of our status.

Additional public information about Key may be found at the Federal Deposit Insurance Corporation’s Bank Find Web site at [http://www2.fdic.gov/idasp/main\\_bankfind.asp](http://www2.fdic.gov/idasp/main_bankfind.asp). Thank you for choosing Key.

Very truly yours,



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