

Our Commitment to Human Rights

At Key, our purpose is to help clients, colleagues, and communities thrive. To us, that means doing business fairly and responsibly, promoting diversity, equity and inclusion, and making meaningful investments in the places where we live and work. We maintain a robust <u>Code of Business Conduct and Ethics</u> that outlines our shared responsibility to act according to the highest professional and ethical standards in everything we do. Key's values are the principles we stand for as a company and as individuals. They serve as the foundation for our strategy, where we seek to build enduring relationships with our clients and play a vital role in defining and guiding our decision making.

Teamwork

We work together to achieve shared objectives.

Key aspires to be the best regional bank in the U.S. We'll do this by building client relationships, giving great service, and caring about our employees.

Respect

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

We know that inclusion, diversity, and respect create powerful outcomes. They improve business performance, help us understand our customers, drive important investments in people, and make our communities stronger through job creation and

economic development.

Accountability

We deliver on what we promise.

Each of us is accountable for operating with the highest degree of integrity, and we expect the same from everyone with whom we do business. Our ethical standards support Key's relationship strategy and our ability to provide our clients with smart solutions and great service.

Integrity

We are open and honest in everything we do.

As Key employees, we protect Key's reputation by always demonstrating the highest level of professionalism and ethical conduct.

Leadership

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

At Key, every employee leads. We consistently demonstrate behaviors that reflect our values, promote an ethical work environment, show respect for others, and drive solid business results.

Key supports the fundamental principles of human rights set forth in the United Nations' <u>Universal Declaration of Human Rights</u> and the <u>Guiding Principles on Business and Human Rights</u>. Consistent with these principles and Key's purpose and values, we aim to build an intentional and dedicated workplace environment where all people are engaged, valued, supported, respected, affirmed, and encouraged to bring their best, authentic selves to work.

Key is committed to providing a safe and healthy working environment free from discrimination or harassment based on race; color; religion; sex; sexual orientation; actual or perceived gender-related expression, identity, mannerisms or other gender-related characteristics; national origin; age; physical or mental disability; pregnancy; veteran status; genetic information; marital status; citizenship status; or any other characteristic protected by law. Key complies with applicable laws and regulations relative to wages and benefits (including a commitment to pay a living wage). We prohibit human rights abuses such as use of forced or child labor, slavery and human trafficking. We expect our business partners (including clients, vendors, suppliers, and contractors) to adhere to these same standards of ethical conduct, as stated in Key's Third Party Supplier Code of Conduct.

Living our values means we keep the best interests of Key in mind. Our employees are expected to comply with Key's policies and procedures and obey all applicable laws and regulations where our business operates. We also strive to create an environment where our employees feel safe taking action when they suspect or observe a problem without fear of retaliation. Our Code of Business Conduct and Ethics outlines multiple avenues by which employees and members of our Board of Directors can report concerns or potential violations. Respecting and upholding the fundamentals of human rights is an ongoing effort, and Key reports progress on these efforts via our corporate website.