

## **Equal Employment Opportunity and Affirmative Action Policy**

Key\* has been and will continue to be committed to equal opportunity for employment to all individuals regardless of race; color; religion; gender/sex; sexual orientation; gender identity; national origin; age; physical or mental disability; pregnancy, childbirth, or related medical conditions; veteran status; genetic information; marital status; citizenship status; or any other basis prohibited by law; and to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. Key\* has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements.

### **Equal Opportunity Policy**

It is Key's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race; color; religion; gender/sex; sexual orientation; gender identity; national origin; age; physical or mental disability; pregnancy, childbirth, or related medical conditions; veteran status; genetic information; marital status; citizenship status; or any other basis prohibited by law. It is also Key's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct or participated in a company or agency investigation into such complaints.

### **Protected Veteran and Individuals with Disabilities Affirmative Action Policy**

Key is a federal contractor subject to Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, Key is committed to taking positive steps to implement the employment-related aspects of its equal opportunity policy. Accordingly, it is Key's policy to take affirmative action to employ, advance in employment, and otherwise treat protected veterans and individuals with disabilities without regard to their veteran status, or physical or mental disability. Key has taken and will continue to take affirmative action to ensure that we recruit, hire, train and promote qualified protected veterans and individuals with disabilities without regard to veteran status, or physical or mental disability; base decisions on employment so as to further the principle of equal employment opportunity; ensure that promotion decisions are in accord with principle of equal employment opportunity by imposing only valid requirements for promotional opportunities; and ensure that all personnel actions such as compensation, benefits, transfers, job eliminations, in-house sponsored training, education, education assistance, social and recreation programs will be administered without regard to veteran status, or physical or mental disability. Under this policy, Key also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of Key's business.

Key's affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or protected veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or protected veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The foregoing policy is and shall continue to be a firm commitment and high priority of Key. The non-confidential portions of the disability or veteran Affirmative Action program shall be made available during normal business hours for inspection upon request by any employee or applicant for employment. Requests for inspection may be submitted to HR Compliance at [HR\\_Compliance@keybank.com](mailto:HR_Compliance@keybank.com).

\*KeyCorp, KeyBank and their affiliates or subsidiaries are referred to individually or collectively herein as "Key".



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### **Application of Policies**

These policies apply when a Key employee is performing a function of his or her job, including all Key locations, client worksites, and company-sponsored or client-sponsored business and social functions. Key's equal opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

### **Workplace Harassment, Including Sexual Harassment**

Consistent with Key's equal opportunity employment efforts, it is the policy of Key to provide and ensure that the work environment for all employees is free from all forms of unlawful harassment, including harassment based on, or because of, an individual's race; color; religion; gender/sex; sexual orientation; gender identity; national origin; age; physical or mental disability; pregnancy, childbirth, or related medical conditions; veteran status; genetic information; marital status; citizenship status; or any other basis prohibited by law. Acts of harassment by employees, supervisors, and managers are prohibited employment practices and are subject to being placed on a Performance Improvement Plan or other appropriate discipline. Employees who feel that they have been subjected to harassment, or those who may have witnessed harassment, are strongly encouraged to bring the matter to the attention of the Employee Relations Solutions Team. An Employee Relations Consultant will investigate the complaint and together with appropriate management officials, take disciplinary action as specific situations may require, up to and including termination from employment.

### **Obligations of Key Management and Employees**

A program of equal opportunity employment requires the full cooperation and understanding of both management and employees. To this end, it is management's responsibility to maintain a work environment that is free from any and all forms of unlawful discrimination and harassment. As an integral part of this overall objective, all employees are encouraged to participate in all activities of Key.

All Key employees have an obligation to contribute to a harassment- and discrimination-free workplace. Any employee who suffers or observes harassment or any other violation of this policy is strongly encouraged to notify the Employee Relations Solutions Team. An Employee Relations Consultant will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, Key will take immediate and appropriate corrective action, up to and including termination of employment.

### **Pay Transparency**

Key will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Key.

### **Non- Retaliation**

Every employee is encouraged to come forward without fear of reprisal, as Key's equal opportunity and affirmative action policies prohibit retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. Employees who believe that they have been subjected to retaliation should bring the matter to the attention of the Employee Relations Solutions Team.



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After receiving a complaint involving a violation of Key's equal opportunity or affirmative action policy, the Employee Relations Consultant will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the extent possible, while affording a thorough investigation. No one, regardless of position or length of service, is exempt from these policies.

### **Responsibility for Implementation**

Key's Chief Executive Officer fully supports Key's disabilities and protected veteran affirmative action programs and is committed to the implementation of Key's equal opportunity and affirmative action policies. The Chief Human Resources Officer will direct and monitor the implementation of personnel procedures to guide Key's affirmative action program. The HR Compliance Officer will establish additional policies and guidelines that may become needed, in addition to designing and implementing audit and reporting systems to keep management informed of the status of equal employment opportunity. Management is responsible to following Key's equal opportunity and affirmative action policies to provide a harassment- and discrimination-free work environment. Employees may contact the HR Compliance Officer or the Employee Relations Solutions Team to discuss concerns they may have.

