



# **Civic Engagement, Compliance, and other considerations**

**KeyCorp**

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# Civic Engagement

- Employees may choose to be active in the political process in a variety of ways including:
  - Making an individual political contribution
  - Volunteering on a campaign
  - Hosting a fundraiser
  - Expressing their views on social media
  - Attending a march or rally
  - Casting a vote
- To ensure that employees are aware of, and informed about, how they can engage in an individual capacity while an employee of Key, we provide varied and ongoing resources to support and facilitate individual participation.



# Informed Decisions and Expectations

## Support

- KeyBank offers **Voting Time-Off** for both primary and general elections.
- In election years we communicate early, and often, about guidelines and policies to ensure individual views and actions are just that: *individual* and not representative of, or affiliated with, the company.
- We offer an internal point-of-contact in both Key Legal (the Law Group) and Government Relations so that employees can seek guidance in advance of taking action.
- **Above all else, we stress the need for civility and respect towards colleagues and with clients.**



# Compliance and other considerations

## Considerations

- Providing support and education for employees affirms our company's commitment to engage in the democratic process.
- In doing so, we aim to aim to minimize reputational, headline and operational risks.
  - Example: An MFP makes an improper contribution; that could disqualify bank from competing for business in X jurisdiction.
  - Example: employee attends political rally for Senator Jane Smith while wearing a company-branded t-shirt.
  - Example: employee uses company email to distribute an invite to a political fundraiser.
  - Example: employee uses social media to criticize local elected official who is a client of the company.