



PUBLIC DISCLOSURE

January 6, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KeyBank, NA
Charter Number: 14761

127 Public Square
Mail Code: OH-01-127-5608
Cleveland, OH 44114

Office of the Comptroller of the Currency

127 Public Square
Mail Code: OH-01-127-0554
Cleveland, OH 44114

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall Community Reinvestment Act Rating

Institution's Community Reinvestment Act (CRA) Rating: This institution is rated Outstanding.

The following table indicates the performance level of KeyBank, NA (referred to as KeyBank or "the bank") with respect to the Lending, Investment, and Service Tests:

Performance Levels	KeyBank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The lending test rating is based on an Outstanding rating in a majority of the bank's rating areas.
- The investment test rating is based on an Outstanding rating in a majority of the bank's rating areas.
- The service test rating is based on a High Satisfactory rating in a majority of the bank's rating areas.
- The bank is a leader in making community development (CD) loans. KeyBank has deployed over \$7.1 billion in CD lending throughout its assessment areas.
- The bank makes significant use of innovative and/or flexible loan products to meet credit needs bank-wide.
- The bank makes significant use of innovative and/or flexible retail banking services bank-wide.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AA).

The bank originated and purchased 93.7 percent of its total loans inside the bank's AAs during the evaluation period. (This percentage is calculated at the bank-level rather than the AA-level.) This factored favorably into the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	60,640	93.8	3,997	6.2	64,637	12,380,401	47.1	13,886,188	52.9	26,266,590
Small Business	45,000	93.8	2,983	6.2	47,983	4,138,104	89.4	488,418	10.6	4,626,522
Small Farm	1,616	88.1	218	11.9	1,834	152,287	80.3	37,330	19.7	189,617
Total	107,256	93.7	7,198	6.3	114,454	16,670,792	53.6	14,411,936	46.4	31,082,729

The 93.7 percent does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Description of Institution

KeyBank is a multistate bank headquartered in Cleveland, Ohio. KeyBank is a wholly owned subsidiary of KeyCorp, a one-bank holding company also headquartered in Cleveland, Ohio. KeyBank offers a broad spectrum of financial products and services to consumers, small businesses and commercial clients through Key Community Bank and Key Corporate Bank. Key Community Bank manages the divisions of Small Business, Retail and Mortgage Lending. Key Corporate Bank manages the divisions of the Community Development Banking Group and KeyBank Community Development Corporation (CDC). In addition to offering traditional loan and deposit products, KeyBank offers cash management and investment services to individuals and businesses. Corporate and investment banking products include merger and acquisition advice, public and private debt and equity, syndications, and derivatives available to middle market companies in selected industries throughout the United States under the KeyBanc Capital Markets trade name.

As of December 31, 2018, KeyBank reported total assets of \$138 billion and deposits of \$110.8 billion. Tier 1 capital was \$13.6 billion. KeyBank's total loans were \$91.8 billion and were 66.6 percent of total assets. KeyBank's loan portfolio consisted of real estate loans of \$33.6 billion (36.6 percent), commercial loans of \$35.9 billion (39.1 percent), other loans and leases of \$14 billion (15.3 percent) and consumer loans of \$7.6 billion (8.3 percent). Farm and agricultural loans comprised a very small percentage of the overall loan portfolio at \$709.1 million (0.8 percent).

Since the previous CRA evaluation, there were several acquisition transactions completed. On October 30, 2015, KeyCorp entered into the largest of these transactions. On this date, a definitive agreement and plan of merger was announced to acquire all outstanding capital stock of First Niagara Financial Group, headquartered in Buffalo, N.Y. On August 1, 2016, First Niagara Bank was merged into KeyBank. In October 2016, First Niagara clients, branches and operations were fully integrated into KeyBank.

KeyBank operated in 19 rating areas that, for CRA related purposes, included 75 AAs in 16 states and three multistate metropolitan statistical areas (MMSA). The 16 states that comprise KeyBank's retail footprint are Alaska, Colo., Conn., Fla., Idaho, Ind., Maine, Mass., Mich., N.Y., Ohio, Ore., Pa., Utah, Vt. and Wash. The three MMSAs are Cincinnati OH-KY-IN MMSA, Portland-Vancouver-Salem MMSA, and Youngstown -Warren-Boardman, OH-PA MMSA. Within its retail footprint, as of December 31, 2018, KeyBank operated 1,184 branch offices and 1,501 automated teller machines (ATM). During the evaluation period, KeyBank continued to maintain its private banking presence in Fla. with retail branch offices and ATMs. KeyBank's 2016 acquisition of First Niagara added more than

300 branch offices to KeyBank's branch network. As a result, KeyBank became the leading bank, by market share, in upstate N.Y. KeyBank strengthened other northeast markets with expanded operations in Pa., Conn. and Mass. During the evaluation period, KeyBank did not exit any markets.

During the evaluation period, KeyBank integrated First Niagara's lending teams and customers and transitioned to First Niagara's loan servicing platform. KeyBank concentrated on customer retention, continued outreach across its footprint and expanded its platforms focusing on the unbanked and underbanked. KeyBank's stated strategy is to serve targeted clients by leveraging broad capabilities, insights and expertise.

Although the economy in which KeyBank operates has generally been strong, gaps still remain between low- and moderate-income (LMI) and middle- and upper-income communities. Specifically, the gaps related to the cost of living, employment and income, present challenges relative to meeting community credit needs. These challenges represent the residual effects of prior economic conditions. Prior to this evaluation period, credit markets stabilized, loan default and delinquency rates decreased, and historically low interest rates drove high volumes of refinanced loans.

KCDC is KeyBank's primary vehicle for delivering CD solutions through tax credit investments that benefit LMI residents and communities within KeyBank's retail footprint. These investments are primarily direct and indirect investments in Low Income Housing Tax Credits (LIHTC), but also include Historic Tax Credits (HTC), New Markets Tax Credits (NMTC) and Small Business Investment Companies (SBIC). KCDC has a specialized originations team and dedicated asset management team for these equity investments. The 2018 Tax Cuts and Jobs Act caused disruption within the equity markets as investors, including KeyBank, reacted to a reduced tax liability and thus a reduction in tax credit appetites. KeyBank also created and invested in an Opportunity Zone Fund using capital gains obtained from the sale of a business unit.

There are no known legal, financial or other factors that impeded the bank's ability to help meet the credit needs in its AAs.

The date of the last CRA Performance Evaluation performed for KeyBank is January 11, 2016. The 2016 CRA evaluation resulted in KeyBank receiving an Outstanding CRA rating.

Scope of Evaluation

Evaluation Period and Products Evaluated

This performance evaluation assessed the bank's CRA performance under the large institution lending, investment and services tests. The evaluation period was from January 1, 2016, to December 31, 2018.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) as well as small loans to businesses and small loans to farms reported under the CRA. All home mortgage products were reviewed, and the conclusions were reached in the aggregate.

Under the lending test, we performed a separate analysis of 2016 data and 2017-2018 data. This was due to changes instituted by the 2015 American Community Survey, which updated income, population and housing information. The survey also resulted in changes to the income designations of some geographies. The changes became effective on January 1, 2017.

Selection of Areas for Full-Scope Review

In each state where KeyBank had an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, those AAs delineated by the bank and located within the same metropolitan statistical area (MSA), MMSA, or combined statistical area (CSA) were combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within a state were combined and evaluated as a single AA and were evaluated as limited-scope areas. Refer to the “Scope” section under each “State Rating” section for details regarding how full-scope AAs were selected. Refer to appendix A, “Scope of Examination,” for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Bank performance in the 2017-2018 evaluation years was weighted more heavily than the 2016 evaluation year. The N.Y., Ohio and Wash. rating areas carried the greatest weight in the OCC’s conclusions as these areas represented KeyBank’s most significant market areas with 60.9 percent of KeyBank’s adjusted deposits, 51.8 percent of loans originated and purchased and 52.2 percent of the branch network.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each “State Rating” and “MMSA Rating” section for details regarding how the full-scope and limited-scope areas were weighted in arriving at the respective ratings.

Other Information

AAs – AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that were serviced by KeyBank’s branches. The AAs did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – Summary reports and maps were reviewed and home mortgage, small business and small farm lending activity was analyzed to identify any gaps in the geographic distribution of loans in the full-scope AA. No unexplained, conspicuous gaps were identified in any of the areas reviewed.

Deposit Market Share – Summary deposit data reported to the Federal Deposit Insurance Corporation as of June 30, 2018 was used, unless otherwise noted. This was the most recent public data available during the evaluation period.

Community Benefits Plan – In 2016, KeyBank announced a National Community Benefits Plan (CBP). The CBP launched in 2017 and was designed to drive investments supporting LMI individuals, families and communities. Through the CBP, KeyBank committed to investing \$16.5 billion in CD, mortgage and small business lending as well as transformative philanthropy through 2021.

- KeyBank committed \$8.8 billion in CD lending and investing to affordable housing and CD solutions and \$5 billion in mortgage lending supporting LMI individuals and communities. KeyBank also committed \$2.5 billion in small business lending to LMI rural and urban communities.
- As of December 31, 2018, KeyBank deployed over \$7.1 billion in aggregate CBP commitments; 38.0 percent above the plan-to-date target established for the time period of January 1, 2017, through December 31, 2018.

- KeyBank committed \$175 million in transformative philanthropy through KeyBank Foundation and FNFG Foundation focused on education, workforce development and neighborhood revitalization.
- KeyBank committed to a \$3 million investment in new product and service innovation to fill the needs of LMI clients. KeyBank Foundation and First Niagara Foundation combined made 3,306 philanthropic investments totaling \$39.6 million in 2018; First Niagara Foundation made 92 philanthropic investments totaling \$6.3 million. These foundation investments, specifically 81.0 percent were consistent with strategic pillars. These commitments invested in education (\$11 million), workforce (\$5.9 million) and neighborhood (\$15 million) activities.

Flexible and Innovative Lending, Investment Products and Services – The bank made significant use of innovative and flexible loan products to meet the AA’s credit needs.

- KeyBank developed KeyBank Plus to offer low-cost check cashing services. When developing KeyBank Plus, KeyBank selected specific markets based on market demographics, check cashing competitor intensity and the strength of the markets’ local leadership to champion the introduction of KeyBank Plus Check Cashing. Within those specific markets, branches were selected to provide these services based on local market knowledge of the individual trade areas around the given branches. Prior to KeyBank Plus, many people had no choice but to pay high check cashing fees. These services do not require an individual to open an account to receive a reasonable rate to cash payroll, government, and tax checks. In February 2004, KeyBank Plus services were launched in five Cleveland area branches. As of December 2018, KeyBank Plus was offered in many branches across Key’s footprint.
- KeyBank’s HassleFree is a BankOn certified product which serves as an industry leading entry level account, accessible to individuals regardless of credit history. HassleFree offers no monthly fees, no minimum account balances, no transaction fees, no overdraft fees and no bounced check fees. In addition, this product provides standard services like online bill-pay, payment deductions, wires transfers, and debt and credit cards. Customers are also offered KeyBank’s full scope of digital banking services, and no-fee access to any one of the bank’s ATMs. HassleFree also allows clients to utilize KeyBank’s Financial Wellness and account monitoring platforms.
- KeyBank’s Loan Assist serves those needing credit and who have not been able to build a good credit profile. An individual’s credit history is an important factor used to determine whether an applicant will receive a loan, credit card or other credit product. Without a credit history, lenders will not know if the applicant is a good candidate for credit. Through Loan Assist, on-time payments to the Loan Assist loan will help the applicant build a good credit history and help the individual when credit is needed later. KeyBank makes a loan to the approved applicant and the proceeds are deposited into a KeyBank savings account that earns interest. The funds are not available for withdraw until the loan is repaid. Once repaid, the money in the savings account plus interest earned may be withdrawn to use any way the applicant chooses. Features of the Loan Assist program include flexible terms, fixed loan rates, online payment from a KeyBank account to the loan, and the creation of a savings account.
- KeyBank’s Secured Card allows account holders to have funds on deposit in a savings account in an amount equal to an assigned credit limit. The credit limit is determined by the amount of available collateral and credit worthiness. When balances are paid on-time, the secured card can help build or rebuild an applicant’s credit history by reporting credit card activity to the credit bureau. The KeyBank Secured Card has no annual fee and a minimum deposit as low as \$300 (up to \$5,000) in a KeySaver account. Applicants receive a credit review twice per year to

determine if they meet the credit criteria to graduate to an unsecured credit card. In addition, all applicants have access to KeyBank's Financial Wellness and account monitoring platforms.

- Over the last several years, in partnership with Regional Housing Authorities, Key Enterprise Commercial Payments Group developed a robust prepaid card portfolio in more than 20 states across the country. The Key2Prepaid program lowers the cost of housing authority services offered to residents by providing residents with prepaid cards. The cards are used for a variety of services including utility payment and supplemental food and nutrition purchases. In addition to serving as an efficient payments tool for public agencies, Key2Prepaid also serves as an entry-level product for unbanked and underbanked individuals, while also serving as a safe alternative to payday lending and high-fee check cashing services.
- KeyBank's Community Development Lending group provides real estate financing for affordable housing and other CD loans throughout KeyBank's national footprint. These financing vehicles include predevelopment loans, construction financing, bridge financing and permanent loans for the preservation and development of affordable housing as well as other community development projects.
- Key's Affordable Mortgage Production Strategy targets specific partners who are positioned within KeyBank's national footprint. Specifically, KeyBank focuses on LMI branch partnerships, builders in LMI communities, housing agencies, and not-for-profit organization partnerships, and collaborates with programs offering down payment assistance.
- KeyBank offers the Small Business Wellness Review. A team of small business experts is available to analyze and coach business owners towards a path of success. Through this process, KeyBank ensures small businesses are utilizing the most applicable products and services for their small business needs. This can include leveraging outside resources and capitalizing on opportunities afforded to businesses located in LMI communities.
- KeyBank has been a top Small Business Administration (SBA) lender for over 16 years and has been designated as an SBA Preferred Lender. As an SBA Preferred Lender, KeyBank can make certain loans without prior approval from the SBA. Preferred lending is a privilege extended to a limited number of banks in the U.S. Many of KeyBank's SBA requests can be done in-house, saving their clients time. KeyBank has primarily focused on SBA 7(a) and SBA 504 products. Since 2015, KeyBank has provided more than \$1.3 billion in SBA-guaranteed financing to thousands of individual small businesses. KeyBank has a dedicated SBA team of SBA relationship managers (In-Market) and a dedicated SBA Credit and SBA Closing Team.

Lending Test

Home mortgage loans and small loans to businesses and farms were evaluated in each AA. For those loan products where KeyBank made less than 20 loans during the evaluation period, an analysis was not conducted because meaningful conclusions could not be made. KeyBank's consumer loans were not analyzed as consumer loans are not considered a primary loan product for the bank and the bank did not request consideration.

A slightly higher weighting was given to borrower distribution components than geographic distribution components within the lending test. The loan distribution analysis compared HMDA loans and loans to

small businesses and small farms to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates how the bank performs relative to other lenders in the AA and provides context as to the reasonableness of the bank's performance. All peer aggregate lending data used in the analysis was from 2016-2018. For the geographic distribution of loans, greater consideration was given to performance in moderate-income tracts when owner-occupied housing units or businesses were limited in low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the poverty level of the AA was considered as well as the significant affordability barriers that exist in certain markets. Also, consideration was given to the volume of CD loans and the degree of responsiveness of those loans to the needs in the community.

Investment Test

Equal consideration was given to the volume of investments and grants made during the current evaluation period as was given to those that remained outstanding from prior evaluation periods. The responsiveness of the investments to the needs of the communities was also a consideration. The bank used LIHTCs in larger AAs. In most AAs, the investments were considered non-complex.

Service Test

Primary consideration was given to KeyBank's performance in delivering retail products and services to geographies and individuals of different income levels through KeyBank's distribution of branches. Focus was placed on branches in LMI geographies. The largest increase in LMI branches came from the acquisition of First Niagara. Most of the branches that closed were in markets where KeyBank and First Niagara had branches in near proximity to each other.

The range of products and services offered by KeyBank through its branch network was evaluated, with emphasis on accessibility to LMI borrowers. Products and services offered were consistent throughout the branch network. Specific focus was placed on any differences in branch hours and services in LMI geographies compared to those in middle- and upper-income geographies. KeyBank offered a wide range of traditional deposit and banking products and services. KeyBank also offered multiple alternative delivery systems commensurate with standard industry offerings, including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture and mobile banking options. The level of retail services provided to LMI borrowers was evaluated based on the bank-provided analysis. ATMs were available at most branches.

KeyBank's record of providing CD services was evaluated. Primary consideration was the responsiveness of the services to the needs of the communities. The greatest consideration was given to CD services that addressed critical needs or were most impactful to the AAs.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining the CRA rating for a national bank or federal savings association (collectively, bank), the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate, whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution or any affiliate whose loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and, other relevant information.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

MULTISTATE METROPOLITAN STATISTICAL AREA RATING

Cincinnati, OH-KY-IN MMSA

CRA rating for the Cincinnati OH-KY-IN MMSA:¹ Satisfactory

The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Good lending activity
- Adequate borrower distribution of loans
- Adequate geographic distribution of loans
- Leader in making CD loans
- Excellent level of CD investments
- Accessible retail delivery systems to all portions of the MMSA
- Good level of CD services

Description of Institution's Operations in Cincinnati MMSA

The Cincinnati MMSA represented KeyBank's 16th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated one AA within the Cincinnati MMSA. Refer to appendix A for a complete description of the AA.

KeyBank had \$952.9 million of deposits in the Cincinnati MMSA representing 0.9 percent of adjusted deposits., KeyBank ranked ninth in the MMSA out of 64 depository institutions with a 0.9 percent market share. The top bank within the MMSA in terms of deposits was U.S. Bank with 48 percent market share. KeyBank operated 23 branches and 23 ATMs within the MMSA, representing 1.9 percent of the bank's branches and 1.5 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$349.3 million in loans, or 1.3 percent of KeyBank's total loan originations and purchases, during the evaluation period.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Cincinnati MMSA. The median housing value of owner-occupied housing units was 4.5 times the MSA annual income of low-income families and 2.8 times that of moderate-income families in the MMSA.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Cincinnati MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	375	14.4	22.9	33.9	26.7	2.1
Population by Geography	1,596,933	9.2	19.9	36.4	33.0	1.6
Housing Units by Geography	690,732	11.4	21.5	36.3	30.2	0.7
Owner-Occupied Units by Geography	402,304	4.3	15.9	40.6	39.0	0.1
Occupied Rental Units by Geography	217,225	19.9	30.5	30.3	18.0	1.4
Vacant Units by Geography	71,203	25.5	25.5	30.1	17.2	1.6
Businesses by Geography	95,378	7.5	18.7	33.0	39.5	1.2
Farms by Geography	2,607	3.2	14.7	49.0	32.8	0.3
Family Distribution by Income Level	399,586	22.3	16.1	19.4	42.2	0.0
Household Distribution by Income Level	619,529	25.8	15.2	16.6	42.4	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$160,023
			Median Gross Rent			\$763
			Families Below Poverty Level			10.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

The Cincinnati MMSA is comprised of 15 counties in three states, including five counties in Ohio, seven counties in Ky. and three in Ind. Based on data from the October 2018 Moody's Analytics report, the area's economy was very strong and remained the second-best performing metro area in Ohio. Cincinnati was expected to remain one of Ohio's strongest economies because of strong employment gains in white-collar services and healthcare, a favorable business environment and a highly educated population. Employment grew steadily in prior years, propelled by gains in a wide range of industries that included finance, manufacturing, construction and consumer. In 2018, the unemployment rate declined to a six-year low of four percent. The largest industries in the area were health care/social assistance, manufacturing, and retail trade. The top five employers at were Kroger Company, University of Cincinnati, Cincinnati Children's Hospital Medical Center, UC Health, and TriHealth.

With a population of 2.2 million, the Cincinnati MMSA ranked as the 29th most populous metropolitan area in the United States, was among the fastest-growing major metro regions in the Midwest and was the largest metro area in Ohio. The economy employed approximately one million people. Growth in personal income was, on average, 3.2 percent from 2011 to 2018. According to the U.S. Bureau of Labor Statistics (BLS), the unemployment rate fluctuated slightly over the evaluation period, averaging 4.4 percent in 2016, 4 percent in 2017 and 4.3 percent in 2018. The unemployment rate in the MMSA was below the overall state of Ohio unemployment rate which averaged 5.2 percent, 4.5 percent, and 4.6 percent during the same respective periods.

Community Contacts

Comments were provided by three community contacts serving the Cincinnati MMSA. The first contact provides homeownership counseling, financial literacy, and foreclosure prevention assistance to 11 communities. The second contact is a local organization focused on investing in housing and other real estate, increasing family income and wealth, and stimulating economic development. The third contact is a private, non-profit partnership of businesses, residents, and government that helps clients prepare for, buy, and maintain a home.

Through the contacts it was noted that, within the MMSA, the quality of housing in many neighborhoods is poor and rents are high. Housing violations are not adequately enforced. Opportunities exist for local financial institutions to provide home rehabilitation loans, auto loans, and small dollar loans. A home repair program is needed that lends low-interest loans to LMI clients and pays the contractors. One contact had seen many clients, particularly elderly clients, get swindled by contractors that do not complete the work. There is a need for tax preparation volunteers; tax preparation workshops are an opportunity for banks to reach the unbanked with checking and savings accounts.

Scope of Evaluation in Cincinnati MMSA

The rating for the Cincinnati MMSA is based on a full-scope evaluation of KeyBank's performance in the Cincinnati OH-KY-IN MMSA AA. There were no limited scope reviews since there were no other AA's delineated by the bank within the MMSA.

Conclusions With Respect to Performance Tests in Cincinnati AA

LENDING TEST

The bank's performance under the lending test in the Cincinnati AA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the Cincinnati AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati MMSA	1,062	820	9	26	1,917

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati MMSA	\$164,532	\$88,840	\$139	\$95,749	\$349,260

KeyBank ranked eighth in deposits with a 0.9 percent market share in the AA. In overall HMDA lending, KeyBank ranked 18th with a 0.7 percent market share. There was a strong amount of competition as indicated by the 504 lenders and 64 depository institutions in the AA. The top three

lenders in this market were Union Savings Bank with 6.5 percent market share, U.S. Bank with 4.4 percent market share and Huntington National Bank with 4.8 percent market share.

In small loans to businesses, KeyBank ranked 16th with 1 percent market share. There was a strong amount of competition as indicated by the 121 lenders in the AA. The top three lenders in this market were American Express with 20.4 percent market share, U.S. Bank with 14.1 percent market share and PNC Bank with 11.2 percent market share. Seven of the top ten small business lenders were nationwide lenders with large business credit card portfolios that together captured over 62 percent of the small loans to businesses.

The level of small loans to farms was not sufficient to provide a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to table O in the Cincinnati AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income census tracts (CT) is well below the percentage of owner-occupied housing in low-income CTs, and well below the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing and below the percentage of loans by all lenders in moderate-income CTs. The housing stock in this AA is older, in poor condition, and in need of rehabilitation. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table Q in the Cincinnati AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is below the percentage of businesses in low-income CTs, and below the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs and exceeds the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to table P in the Cincinnati AA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and below the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers is near to the distribution of moderate-income families and below the percentage of loans by all lenders to moderate-income families. Home purchase loans have been restricted due to the need for housing violations to be cleared before a purchase can ensue. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the Cincinnati AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of the bank's originations and purchases of small loans to businesses by revenue is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Community Development Lending

KeyBank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Cincinnati AA is excellent. KeyBank made 26 CD loans in its AA for a total of \$95.7 million, which represents 80 percent of tier 1 capital allocated to the AA. CD lending performance had a significant positive impact on the lending test rating. The CD loans provided funding for affordable housing projects, a critical need in the AA. KeyBank made 23 loans totaling \$90.6 million (94.6 percent of all CD loans). Additionally, KeyBank extended three loans totaling \$5.1 million for economic development of the AA.

Examples of CD loans in the AA include:

KeyBank originated two CD loans totaling \$23.8 million for the rehabilitation of an existing affordable apartment complex. Originally built in 1925 as a luxury hotel, the property was converted to 200 family-tenancy units in the late 1970s. All units are rent restricted to families earning up to 60 percent of the average moderate income and, as a function of the housing assistance payments contract, tenants pay 30 percent of their income on rent. KeyBank also invested \$12.5 million in 4 percent LIHTCs for this rehabilitation project.

KeyBank originated \$16.8 million in two CD loans to renovate and construct 119 affordable apartment units located at seven sites in a Cincinnati neighborhood. The project consisted of 59 housing assistance payment contract units, 40 non-subsidized tax credit units and 20 market-rate units. Residents in the U.S. Department of Housing and Urban Development (HUD) Section 8 units pay 30 percent of their income toward rent.

KeyBank provided two CD loans totaling \$9.1 million to finance the acquisition of five historic and vacant buildings in a Cincinnati neighborhood that needed significant renovations. The buildings provide 48 affordable housing units for individuals earning between 30 and 40 percent of the average moderate income. The renovations will assist in revitalization and future development of this neighborhood.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. KeyBank makes significant use of innovative and complex CD loans such as being a financier and a LIHTC project investor in affordable housing projects within the AA. This key lender role demonstrates the leadership role in originating CD loans to rehabilitate affordable housing in the form of apartment complexes.

INVESTMENT TEST

The bank's performance under the investment test in the Cincinnati AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Cincinnati AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati MMSA	15	\$13,514	11	\$36,731	26	100	\$50,245	100	13	\$22,904
Total	15	\$13,514	11	\$36,731	26	100	\$50,245	100	13	\$22,904

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The dollar volume of the current and prior period investments represented 41.8 percent of tier 1 capital allocated to the AA.

KeyBank provided four grants totaling \$319 thousand to a variety of organizations that primarily support community services and economic development. The total CD investment volume of the bank's current and prior period investments was focused on affordable housing.

CD investments involved many complex LIHTC projects where KeyBank often acted in a leadership role with participations from federal, state and local housing agencies and real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$12.6 million LIHTC equity investment in a 200-unit affordable apartment complex. In addition to the \$12.6 million equity investment, KeyBank also originated two CD loans totaling \$23.8 million for the rehabilitation of this affordable apartment complex. All units are rent restricted to families earning up to 60 percent of the average moderate income and, as a function of the housing assistance payments contract, tenants pay 30 percent of their income for rent.

KeyBank made a \$10.2 million LIHTC equity investment in a construction project to build 80 units of permanent supportive housing located in a Cincinnati neighborhood to service residents earning 50 to 60 percent of the average moderate income. All units are one-bedroom and have a Section 8 project-based voucher subsidy. Sixty units provide housing for eligible adults who meet the HUD definition of chronically homeless. The remaining 20 units target low-income residents with a physical or mental disability that meet HUD's definition of disability and that require supportive housing to remain stable in housing.

SERVICE TEST

The bank's performance under the service test in the Cincinnati AA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Cincinnati AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati MMSA	100	23	100	0	17.4	39.1	43.5	9.2	19.9	36.4	33

The bank's distribution of branches in low-income geographies is well below, and in moderate-income geographies is near to, the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 23 ATMs, all of which were deposit-taking ATMs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cincinnati MMSA	0	-2	-1	-1	0	0

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank closed two branches since the last evaluation. KeyBank closed one branch in a low-income geography and closed another in a moderate-income geography. LMI customers continue to have access to all bank services.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The institution is a leader in providing CD services.

Twelve employees were actively involved during the evaluation period by serving on boards and committees of organizations that provide affordable housing, community services, or economic development. These twelve employees provided a total of 1,047 hours of service to these organizations.

Two KeyBank employees provided 216 hours of service on the board of directors, and to LMI families and individuals, through job creation programs, minority owned business support programs, and youth coaching.

Two KeyBank employees provided 62 hours of service on the board of directors of an organization that provides crisis intervention and support for survivors of violence in primarily LMI neighborhoods in the AA.

Portland-Vancouver-Salem, OR-WA MMSA

CRA rating for the Portland-Vancouver-Salem MMSA:² Outstanding

The **lending test** is rated: Outstanding

The **investment test** is rated: Outstanding

The **service test** is rated: Outstanding

The major factors that support this rating include:

- Good lending activity
- Good distribution of loans by income level of the borrower
- Good geographic distribution of loans
- Leader in CD lending
- Excellent level of qualified CD investments
- Readily accessible service delivery systems to all portions of the MMSA
- Excellent CD services that are responsive to the needs of the MMSA

Description of Bank's Operations in Portland-Vancouver-Salem MMSA

The Portland-Vancouver-Salem MMSA represented KeyBank's eighth largest rated area of 19 rating areas, in terms of deposits. KeyBank delineated five AAs within the Portland-Vancouver-Salem MMSA. The bank-delineated AA's are combined, analyzed, and presented as one AA (Portland AA) for purposes of this evaluation. Refer to appendix A for a complete description of the AA.

KeyBank had \$4.2 billion of deposits in the Portland-Vancouver-Salem MMSA representing 3.9 percent of adjusted deposits. KeyBank ranked fifth in the MMSA out of 36 depository institutions with a 7.1 percent market share. The top three depository institutions within the MMSA in terms of deposits were U.S. Bank with 21.1 percent market share, Bank of America with 17.9 percent market share and Wells Fargo Bank with 16.3 percent market share. KeyBank operated 63 branches and 64 ATMs within the MMSA, representing 5.4 percent of the bank's branches and 4.3 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$1.3 billion in loans, or 7.1 percent of total bank loan originations and purchases, during the evaluation period. The bank's primary loan products in the MMSA were home mortgage and small loans to businesses and farms.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Portland-Vancouver-Salem MMSA. The median housing value was 3.4 times the highest MSA median income, and 4.3 times moderate-income, and 6.9 times low-income, indicating a limited proportion of owner-occupied units are affordable to LMI residents.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Portland MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	609	3.3	23.6	45.2	27.3	0.7
Population by Geography	2,968,018	2.7	24.7	45.5	26.9	0.2
Housing Units by Geography	1,197,241	2.7	24.1	45.3	27.7	0.3
Owner-Occupied Units by Geography	682,401	1.2	18.0	48.6	32.1	0.0
Occupied Rental Units by Geography	442,239	4.8	33.1	40.0	21.4	0.7
Vacant Units by Geography	72,601	3.2	26.1	46.4	23.9	0.4
Businesses by Geography	247,442	3.3	22.0	40.4	32.2	2.1
Farms by Geography	9,245	2.0	13.4	55.0	29.3	0.4
Family Distribution by Income Level	723,468	21.4	17.4	20.4	40.8	0.0
Household Distribution by Income Level	1,124,640	24.0	16.2	18.1	41.7	0.0
Median Family Income MSA - 10540 Albany, OR MSA		\$54,713	Median Housing Value			\$265,140
Median Family Income MSA - 18700 Corvallis, OR MSA		\$76,967	Median Gross Rent			\$975
Median Family Income MSA - 31020 Longview, WA MSA		\$57,938	Families Below Poverty Level			10.1%
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$73,089				
Median Family Income MSA - 41420 Salem, OR MSA		\$58,033				
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Portland-Vancouver-Hillsboro, OR-WA MSA

Based on data from the August 2018 Moody's Analytics report, Portland's economy was strong. The major economic drivers for were the highly diversified economy, highly skilled workforce, and rising state and local tax revenues. The largest employers in the Portland MSA included the Intel Corp, Providence Health Systems, and Oregon Health and Science University. Portland's business and living costs were lower than Seattle and the Bay Area and there was a high concentration of highly educated workers. A tightening job market was leading to an increase in wages as firms faced challenges attracting and retaining workers. According to the U.S. BLS, the unemployment rate for the second quarter of 2018 was 3.9 percent, which decreased from 4.6 percent at the beginning of the evaluation period. The unemployment rate in the AA was slightly lower than both the overall states of Ore. (4.1 percent) and Wash. (4.2 percent) during the same period.

The outlook for Portland's housing market was above average largely due to favorable demographic trends. Despite strong demand and constraints on supply, house price appreciation slowed, dipping below the U.S. average for the first time since 2012. Eroding affordability was a key reason for the

slowdown. From 2015, the median existing single-family home rose by one-third to just less than \$400 thousand. Multifamily housing starts were seven thousand in 2017, the most since 1996.

Albany, OR MSA

Based on data from the July 2018 Moody's Analytics report, Albany's economy was strong. Nearly one-fifth of Albany's workers were employed in manufacturing (specializing in metals, wood products and paper). Farm employment made up eight percent of Albany's total workforce; the highest share in Ore. and among the top 15 in the West region. The largest employers in Albany included Oregon State University, Samaritan Health Services and ATI. According to the U.S. BLS, the unemployment rate for the third quarter of 2018 was 4.6 percent, and decreased from 5.7 percent at the beginning of the evaluation period. The unemployment rate in the AA was slightly higher than the overall state of Oregon (4.1 percent during the same period). The housing market remained strong.

Corvallis, OR MSA

Based on data from the July 2018 Moody's Analytics report, Corvallis' economy was slowing. Job growth had slowed and remained a step behind the rest of the state because of labor shortages. The largest employers in Corvallis included Oregon State University, Samaritan Health Services and Hewlett-Packard. According to the U.S. BLS, the unemployment rate for the third quarter of 2018 was 3.2 percent, and decreased from 3.9 percent at the beginning of the evaluation period. The unemployment rate in the AA was lower than the overall states of Ore. (4.3 percent) during the same period.

Housing demand in the MSA was outpacing supply. Low inventories of unsold homes plagued Corvallis for years, but new residential building finally picked up late in 2017 and was expected to translate to more work under construction in 2018. A renewed boost in housing starts and projects commissioned by Oregon State pointed to higher construction outlays

Longview, WA MSA

Based on data from the July 2018 Moody's Analytics report, Longview's economy was firmly in mid-cycle expansion. Payroll employment struggled to get off the ground in 2017, but growth through July 2018 was the fastest in almost four years. Job gains were also more widespread than most of this cycle. The largest employers in Longview included Christus Good Shepherd Health System, Eastman Chemical and Walmart Stores, Inc. According to the U.S. BLS, the unemployment rate for the third quarter of 2018 was 5.9 percent, and decreased from 7.1 at from the beginning of the evaluation period. The unemployment rate in the AA was similar to the overall state of Wash. (4.4 percent) during the same period. Demand for single-family homes softened from the prior year, and price appreciation slowed considerably. As for housing, eroding affordability was a key reason for the slowdown; from 2012 to 2018, the home price-to-income ratio rose by more than one-third.

Salem, OR MSA

Based on data from the July 2018 Moody's Analytics report, Salem's economy slowed but was still in good shape. Employment gains decelerated sharply over 2017 because of a fall in state and local government jobs. The private sector was advancing with net hiring in nearly all private industries outpacing that of the region and the nation. As demand outpaced supply, house price growth remained elevated. The largest employers in Salem included the Salem Hospital, SuperMedia LLC and

Association of Salem Keizer Education Support. According to the U.S. BLS, the unemployment rate for the third quarter of 2018 was 4.3 percent, and decreased from five percent at the beginning of the evaluation period. The unemployment rate in the AA was similar to the overall state of Ore. (4.3 percent) during the same period.

Community Contacts

Comments were provided by several community contacts serving the Portland-Vancouver-Salem MMSA. One contact was with a community action agency that offers homebuyer education, foreclosure prevention, home repair grants and pre- and post-purchase counseling. The second contact was with a small business association that offers a variety of networking events and professional development opportunities to connect and foster growth in the region's business community.

Through the contacts it was noted that the local economic condition was booming, and businesses were cropping up all over the Portland metropolitan area. The housing market is tight, with prices on the rise. Portland has a lot of displaced individuals, especially in the downtown area, which is very visible and expands to the surrounding neighborhoods and communities. A contact serving low-income residents in Polk County commented that the county has an aging population. Although there is more wealth concentrated on the coast, there are actually no towns in Polk County deemed to be affordable to those who earn the median income. Considering the information from the community contacts and bank management as well as demographic and economic data, small business lending and affordable housing represent the primary needs for the Portland MMSA. Opportunities exist to originate these types of loans throughout the area. These opportunities are limited in the low-income geographies as reflected by the small proportion of OOU's coupled with limited home affordability for LMI individuals.

Scope of Evaluation in Portland MMSA

KeyBank delineated five AAs within the Portland-Vancouver-Salem MMSA. The bank-delineated AA's are combined, analyzed, and presented as one AA (Portland AA) for purposes of this evaluation. The rating for the Portland MMSA is based on a full-scope evaluation of KeyBank's performance in the Portland AA. There were no limited scope reviews.

Conclusions With Respect to Performance Tests in Portland AA

LENDING TEST

The bank's performance under the lending test in the Portland AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Portland AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs given the number of institutions lending in the AA.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Portland MMSA	4,234	2,943	234	41	7,452

Dollar Volume of Loans (000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Portland MMSA	\$1,020,834	\$384,868	\$40,149	\$264,268	\$1,710,119

KeyBank ranked fifth in deposits with a 7.1 percent market share in the AA. In overall HMDA lending, KeyBank ranked 12th with a 1.7 percent market share. KeyBank was in the top two percent of lenders within the AA. There was strong competition as reflected by the 653 lenders and 36 depository institutions in the AA. The top three lenders in this market were Boeing Employees Credit Union with 9.4 percent market share, Wells Fargo Bank with 6.7 percent market share and JPMorgan Chase Bank (Chase Bank) with 4.2 percent market share.

In small loans to businesses, KeyBank ranked 10th with a market share of 1.4 percent. There was strong competition in the market with approximately 151 lenders. The top three lenders were Bank of America with 19.3 percent market share, Chase Bank with 15.2 percent market share, and American Express with 14.7 percent market share. Eight of the top ten small business lenders were nationwide lenders with large business credit card portfolios that together captured over 82 percent of the number of small loans to businesses.

In small loans to farms, KeyBank ranked 12th with a market share of 1.3 percent. There were 22 other lenders in the AA. The top three lenders were Bank of America with 29.2 percent market share, Chase Bank with 19.5 percent market share and U.S. Bank with 16.5 percent market share. Small farm lending is not a primary product for KeyBank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

There was more emphasis placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to table O in the Portland AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects good distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below the percentage owner-occupied housing units and below the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income geographies is near to the percentage of owner-occupied housing units and below the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is stronger than 2017-2018 and enhanced the overall geographic distribution rating for home mortgage loans.

Small Loans to Businesses

Refer to table Q in the Portland AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is near to the percentage of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the Portland AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank's overall geographic distribution of small loans to farms for this evaluation is very poor.

In 2017-2018, KeyBank did not make any small loans to farms in low-income CTs. The percentage of small loans to farms in moderate-income CTs is significantly below the percentage of farms in those CTs and below the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to table P in the Portland AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is significantly below the distribution of low-income families. There were home affordability issues in the AA, especially for LMI borrowers. The median housing value is 6.9 times the income of low-income families. Despite the affordability issues noted above, the percentage of home mortgage loans to low-income borrowers is near to the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers is below both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the Portland AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to small businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is well below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the Portland AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of the bank's originations and purchases of small loans to farms by revenue is good.

In 2017-2018, the percentage of KeyBank's loans to small farms (farms with revenues of \$1 million or less) is well below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small farms exceeds the percentage of loans by all lenders to small farms in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Portland AA is excellent. KeyBank made 41 CD loans in its AA for a total of \$264.3 million, which represents over 50 percent of tier 1 capital allocated to the AA. CD lending performance had a significant positive impact on the lending test rating. The bank makes significant use of innovative and/or complex CD loans and is involved in many complex projects where the bank often acts in a leadership role. The majority of these loans are for the primary purpose of affordable housing which is a critical CD need in the bank's AA. The bank made 24 loans totaling \$233 million (88.2 percent) for affordable housing. Additionally, the bank extended eight CD loans totaling \$12.7 million for community services to assist LMI individuals and nine loans totaling \$18.6 million of economic development.

Examples of CD loans in the AA include:

In June 2017, KeyBank provided a \$5.8 million construction loan for an affordable housing development located within the AA. The development sets aside 23 of the 32 units for individuals experiencing permanent homelessness or households that are at high risk for homelessness. Fifteen units are restricted for tenants earning at or below 30 percent of the area median family income (MFI) with

the remaining units being designated for tenants earning at or below 50 percent of the area MFI. This activity is responsive to the identified need for affordable housing and addressing homelessness. KeyBank demonstrated multi-faceted support by providing both the construction loan and the equity investment (\$6 million) to support this affordable housing development.

During the exam timeframe, KeyBank extended five CD loans totaling \$11.2 million to an organization that provides community services to LMI individuals within the AA. The organization provided psychiatric residential treatment services for children requiring 24-hour support. The purpose of these loans was to partially fund a construction project to make improvements to its location in Corvallis, OR.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. KeyBank makes significant use of innovative and complex CD loans and acts in a leadership role by originating CD loans to rehabilitate permanent and interim affordable housing projects for LMI families.

INVESTMENT TEST

The bank's performance under the investment test in the Portland AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Portland AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland MMSA	9	\$14,198	19	\$75,117	28	100%	\$89,315	100%	16	\$48,269

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 16.9 percent of tier 1 capital allocated to the AA.

The volume of the bank's current and prior period investments focused on affordable housing, which is a significant need in the AA. Additionally, the bank provided grants to several organizations that support community services to assist LMI individual and families.

CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies and real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$6 million LIHTC investment for the construction of an affordable housing development located within the AA. This activity was responsive to the identified need for affordable housing and for addressing homelessness. KeyBank demonstrated multi-faceted support by providing both the equity investment and the construction loan (\$5.8 million) to support this affordable housing development. Refer to the writeup under the “Community Development Lending” section for additional detail regarding the affordable project.

KeyBank provided a three-year \$225 thousand grant to a housing counseling organization that provides homeownership to LMI, minorities and single-person households with access to homeownership. The grant assists the organization in its efforts to focus on targeting market borrowers outside of Multnomah County and the City of Portland where homeownership is unaffordable for their clients.

KeyBank provided a two-year \$250 thousand grant to a micro-enterprise organization with a mission to improve the economic opportunities of underserved individuals through empowerment, education and entrepreneurship for the benefit of the greater community. This organization serves economically distressed and underserved communities within the AA. This grant provides funding to expand small business programming to the community in East Multnomah County where the poverty rate is high.

SERVICE TEST

The bank’s performance under the service test in the Portland AA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Portland AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Portland MMSA	100	63	100	3.2	27.0	38.1	28.6	2.7	24.7	45.5	26.9

* May not add up to 100 percent due to geographies with unknown tract income level and rounding. Population in CTs with income unknown represent 0.2 percent and the bank’s branches in these tracts represent 3.1 percent of total branches in the AA.

The bank’s distribution of branches in LMI geographies exceeds the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards, deposit taking ATM locations, online banking, electronic bill-pay and mobile banking options. These

systems provided additional availability and access to banking services for both retail and business customers. KeyBank had 64 ATMs in the AA.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Portland MMSA	0	-4	0	-2	0	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open any branches and closed two branches in moderate-income CTs. The closure of branches in moderate-income geographies was to consolidate with other branches nearby and did not negatively impact the distribution of branches relative to the population residing in those geographies.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The bank is a leader in providing CD services.

KeyBank employees provided assistance on 148 CD service activities, involving 10 organizations, since the last evaluation. Six employees were actively involved during the evaluation period by providing technical assistance or serving on the boards and committees for these organizations. The employees logged a total of 1,107 hours within this AA.

The following are examples of CD services provided in this AA:

Two KeyBank team members provided 184 hours of board service to a housing development organization that provides opportunity for low-income families and individuals by developing, preserving and sustaining affordable housing and community facilities.

A KeyBank team member provided 367 hours of board service to a community organization that provides assistance to homeless individuals and low-income families in seeking solutions to end living in poverty.

Youngstown-Warren-Boardman, OH-PA MMSA

CRA rating for Youngstown-Warren-Boardman, OH-PA (OH-PA) MMSA:³ Satisfactory

The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good lending activity
- Adequate distribution of loans by income level of the borrower
- Adequate distribution of loans by geography
- Relatively high level of CD lending
- Significant level of qualified CD investments
- Unreasonably inaccessible service delivery systems to LMI portions of the MMSA
- Few, if any, CD services provided

Description of Bank's Operations in Youngstown-Warren-Boardman MMSA

The Youngstown-Warren-Boardman MMSA represented KeyBank's 19th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated one AA in the MMSA. Refer to appendix A for a complete description of the AA.

KeyBank had \$152 million of deposits in the Youngstown-Warren-Boardman MMSA representing 0.1 percent of adjusted deposits. KeyBank ranked ninth in the MMSA out of 14 depository institutions with a 1.9 percent market share. The top three depository institutions within MMSA in terms of deposits were Huntington National Bank with 24.6 percent market share, Home Savings Bank with 15.1 percent market share and Chase Bank with 12.2 percent market share. The top five competitors held 72.7 percent of all deposits within the MMSA. KeyBank operated four branches and four ATMs within this AA, representing 0.3 percent of the bank's total branches and 0.3 percent of the bank's total ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$38.5 million in loans, or 0.3 percent of its total bank loan originations and purchases, during the evaluation period.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Youngstown-Warren-Boardman MMSA. The volume of owner-occupied housing units in low-income tracts is low compared to other geographies, and over 38 percent of the families in the MMSA are LMI. However, the area's median housing value is less than two times the MFI, indicating that housing is generally affordable for LMI households. The percentage of households below the poverty line is significantly higher than national averages, indicating that homeownership may be out of reach for a significant portion of the low-income population.

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Youngstown-Warren-Boardman OH-PA MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	125	16.0	20.8	42.4	20.8	0
Population by Geography	440,923	9.7	16.5	46.4	27.4	0
Housing Units by Geography	207,134	10.3	17.4	46.3	26	0
Owner-Occupied Units by Geography	128,241	5.7	13.6	49.5	31.2	0
Occupied Rental Units by Geography	56,377	15.7	23.9	42.3	18.1	0
Vacant Units by Geography	22,516	23.3	22.9	37.9	16.0	0
Businesses by Geography	23,507	8.6	13.2	40.0	38.2	0
Farms by Geography	836	2.4	7.5	49.6	40.4	0
Family Distribution by Income Level	116,328	21.2	18.0	20.5	40.3	0
Household Distribution by Income Level	184,618	24.6	16.0	17.9	41.6	0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$96,456
			Median Gross Rent			\$632
			Families Below Poverty Level			13.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the October 2018 Moody's Analytics report, the Youngstown-Warren-Boardman area was entering a recession. For the prior three years, unemployment increased, reaching 2008 levels. Job reductions in manufacturing and health care drove the downturn. The region's population was declining, and income gains were below-average. Auto manufacturing was a significant portion of the area's economy and the closure of the Lordstown automotive plant resulted in the loss of 1,600 jobs. Energy manufacturing represented another segment of the manufacturing industry, but increased oil and gas drilling was not expected to have much of an impact. According to the U.S. BLS, the unemployment rate fluctuated slightly throughout the evaluation period, averaging 6.5 percent in 2016, 6.7 percent in 2017 and 5.7 percent in 2018. The unemployment rate in the AA was higher than the overall state of Ohio unemployment rate which averaged 5 percent, 5 percent, and 4.5 percent, respectively.

Housing prices remained affordable in the area, with the median home value equal to 1.75 times the median family household income. Housing prices may decline as workers leave the area in search of work, depressing the demand for housing.

Community Contacts

The analysis considers comments provided by two community contacts serving the Youngstown-Warren-Boardman MMSA. The contacts represented a local economic development organization and a neighborhood development corporation. Job losses due to manufacturing outsourcing are an issue and stable employment remains a concern. Rental options are generally sub-standard compared to owner-

occupied properties. There is a need for quality rental properties that could be provided by contractors and small developers if they had access to lines of credit and additional capital. Pay-day lending, land contracts, and rent-to-own businesses remain present in the MMSA due to a segment of the population distrusting banks. The housing stock is old and in need of substantial repairs. There is a need for lines of credit for homeowners to improve the quality of the local housing stock. The lack of updated housing deters some people, especially younger and higher earners, from purchasing homes in the MMSA. Homes in the region remain affordable.

Scope of Evaluation in Youngstown-Warren-Boardman MMSA AA

KeyBank delineated one AA in the MMSA. A full-scope review of the Youngstown-Warren-Boardman MMSA AA was conducted. The AA represented 0.3 percent of the bank's total lending, 0.3 percent of the bank's total number of branches, and 0.1 percent of the bank's total deposits. There were no limited scope reviews since there were no other AA's delineated by the bank within the MMSA.

Conclusions With Respect to Performance Tests in Youngstown-Warren-Boardman AA

LENDING TEST

The bank's performance under the lending test in the Youngstown-Warren-Boardman AA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown-Warren-Boardman AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
OH-PA MMSA	233	111	0	2	346	100%	100%
Total	233	111	0	2	346	100%	100%

Dollar Volume of Loans (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
OH-PA MMSA	\$22,329	\$14,706	\$0	\$3,983	\$41,018	100%	100%
Total	\$22,329	\$14,706	\$0	\$3,983	\$41,018	100%	100%

KeyBank ranked ninth in deposits with a 1.9 percent market share in the AA. In overall HMDA lending, KeyBank ranked 40th with a market share of 0.5 percent. Competition was strong within the market as reflected by 256 lenders operating within the AA. The three largest lenders within the market were the Home Savings and Loan Company with 7.3 percent market share, Huntington National Bank with 7.2 percent market share and Seven Seventeen Credit Union with 6.7 percent market share.

In small loans to businesses, KeyBank ranked 23rd with a market share of 0.6 percent. There was strong competition with 86 total lenders in the market. The top three lenders in the market were American Express with 13.8 percent market share, Chase Bank with 13.7 percent market share and PNC Bank with 10.5 percent market share.

The level of small loans to farms was not sufficient to provide a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Equal emphasis was placed on the bank's performance in 2016 and 2017-2018 for home mortgage and small business lending.

Home Mortgage Loans

Refer to table O in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects poor distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is significantly below the percentage of owner-occupied housing in low-income CTs. When compared to aggregate lending data, the percentage of home mortgage loans in low-income CTs exceeds the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is significantly below the percentage of owner-occupied housing in moderate-income CTs. When compared to aggregate lending data, the percentage of home mortgage loans in moderate-income CTs is significantly below the percentage of loans by all lenders in moderate-income CTs.

In 2016, the performance is stronger. The percentage of home mortgage loans to borrowers in low-income CTs is significantly below the percentage of owner-occupied housing in low-income CTs. When compared to aggregate lending data, the percentage of home mortgage loans in low-income CTs exceeds the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is near to the percentage of owner-occupied housing in moderate-income CTs. When compared to aggregate lending data, the percentage of home mortgage loans in moderate-income CTs exceeds the percentage of loans by all lenders in moderate-income CTs.

Small Loans to Businesses

Refer to table Q in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is well below the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of

businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is weaker than 2017-2018.

Small Loans to Farms

Refer to table S in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate any small loans to farms during 2017-2018. As a result, no analysis was conducted.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to table P in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and is near to the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income individuals is near to the distribution of moderate-income families and is below the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is stronger than the performance in 2017-2018.

Small Loans to Businesses

Refer to table R in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution to loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA in 2017-2018. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the OH-PA MMSA AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate any small loans to farms during 2017-2018. No analysis was conducted as a result.

Community Development Lending

The bank has made a relatively high level of CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is good. KeyBank originated two loans, totaling \$4.0 million, which represented 21 percent of tier 1 capital allocated to the AA. These two loans were made to two organizations that support affordable housing options in the MMSA.

An example of a CD loan made in the AA includes:

KeyBank originated a \$3.2 million loan and a \$748 thousand loan to an LIHTC fund that allows the fund management team to meet its cash management needs. The fund invests in projects that support LIHTC eligible developments in the MMSA.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the investment test in the Youngstown-Warren-Boardman AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Youngstown-Warren-Boardman AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
OH-PA MMSA	7	721	3	12,025	10	100%	\$12,746	100%	8	7,704

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank made two investments totaling \$12 million during the evaluation period. Of the investments made during the evaluation, the bank invested the entire \$12 million in affordable housing funds that invest in affordable housing or support LIHTC developments. The bank had an additional \$7.7 million in unfunded commitments that will further support affordable housing. In addition, the bank had seven prior period investments totaling \$721 thousand, similarly focused on affordable housing funds. Total prior and current period investments totaled 66.6 percent of tier 1 capital allocated to the AA. The bank's investments in the AA have resulted in the addition of 325 affordable housing units, of which 100 were created during the current evaluation period and 225 were created during the prior evaluation period.

In addition to its investments, the bank made one donation or grant to a local community organization for \$15 thousand.

SERVICE TEST

The bank's performance under the service test in the Youngstown-Warren-Boardman AA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown-Warren-Boardman AA is adequate.

Retail Banking Services

Delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies, and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
OH-PA MMSA	100%	4	100%	0%	0%	0%	100%	9.7%	16.5%	46.5%	27.4%

The bank's distribution of branches in low- and moderate-income CTs is significantly below the distribution of the population living in these areas. Of the four branches, none were located in LMI CTs

and all four branches were located in upper-income CTs. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had four ATMs in the AA.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
OH-PA MMSA	0	2	0	0	2	0

The bank's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches during the evaluation period, both of which were located in middle-income CTs.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Services are comparable among locations. Two of the bank's four branches are open on Saturdays and three of the four branches have extended hours on Fridays. The bank offers banking services by mobile phone, online and by telephone. The bank does not offer KeyBank Plus services at these branches.

Community Development Services

The bank provides few, if any, CD services.

KeyBank did not provide documentation of employees who participated or supported any organizations that support LMI populations or community development activities during the evaluation period.

STATE RATING

State of Alaska

CRA rating for the State of Alaska:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Good lending activity
- Adequate geographic distribution of loans
- Good borrower distribution of loans
- Leader in CD Lending
- Excellent level of qualified CD investments
- Accessible service delivery systems to essentially all portions of the AA
- Very poor level of CD service

Description of Bank's Operations in Alaska

The state of Alaska represented KeyBank's 14th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated three AAs within the state of Alaska. Refer to appendix A for a complete description of each AA.

KeyBank had \$1.2 billion of deposits in Alaska representing 1.1 percent of the bank's adjusted deposits. In Alaska, KeyBank ranked third out of seven depository institutions with an 11.7 percent market share. The top two depository institutions within the three AAs were Wells Fargo Bank with 47.8 percent market share and First National Bank of Alaska with 20.7 percent market share. KeyBank operated 14 branches and 14 ATMs, which represented 1.3 percent of the bank's branches and 1 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$253.7 million in loans, or 0.3 percent of KeyBank's total loan originations and purchases, during the evaluation period.

ANCHORAGE MSA

The Anchorage MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the AA. The median housing value of owner-occupied housing units is 5.3 times the annual income of low-income families and 5.1 times that of moderate-income families in the MSA. This indicates that a limited proportion of the owner-occupied units are affordable to LMI individuals.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Anchorage MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	79	2.5	26.6	53.2	17.7	0
Population by Geography	395,285	3.0	23.6	51.5	21.8	0
Housing Units by Geography	155,394	2.6	25.7	51.6	20.1	0
Owner-Occupied Units by Geography	86,653	1.0	15.9	55.1	27.9	0
Occupied Rental Units by Geography	49,620	5.6	38.4	45.2	10.8	0
Vacant Units by Geography	19,121	1.9	36.9	52.3	8.9	0
Businesses by Geography	31,126	3.4	26.6	49.5	20.5	0
Farms by Geography	625	1.3	18.2	59.7	20.8	0
Family Distribution by Income Level	91,970	19.8	18.0	22.5	39.7	0
Household Distribution by Income Level	136,273	21.8	17.1	20.0	41.1	0
Median Family Income MSA - 11260 Anchorage, AK MSA		\$89,267	Median Housing Value			\$259,483
			Median Gross Rent			\$1,238
			Families Below Poverty Level			5.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the November 2018 Moody's Analytics report, Anchorage was struggling economically because of its high dependence on energy and government sector jobs. Wage growth was moving very slowly, rising only 2 percent since the start of 2015 compared with 10 percent nationally. Oil prices had fallen by nearly 25 percent and the area's mining employment was level. The price of homes was depreciating in the Anchorage area due to few job prospects and flat wages, which were sidelining many job seekers. The Anchorage MSA had an educated workforce and favorable age demographics with a median age of 34.3 years. Major employers in the area were Providence Health & Services, Carrs/Safeway and Alaska Airlines. According to the U.S. BLS, the unemployment rate fluctuated slightly throughout the evaluation period, averaging 6.1 percent in 2016, 6.4 percent in 2017 and 5.9 percent in 2018. The unemployment rate in Anchorage was slightly lower than the overall state of Alaska unemployment rate which averaged 6.9 percent, 6.9 percent and 6.5 percent, respectively.

Community Contacts

This analysis considers comments provided by ten community organizations serving the Anchorage MSA. The organizations represented affordable housing and social services agencies serving LMI communities. Comments regarding the area economy noted high unemployment as a major concern. Anchorage is in a recession with a 5.9 percent unemployment rate. Unemployment has risen as high as 90 percent in some villages. Native dividends have been cut due to the low price of oil. There has been a large influx of foreign immigrants whose first language is not English, making it difficult for them to

find quality employment. The Alaskan legislature had a \$3 billion shortfall, impacting the capital budget and affecting the rural communities the worst.

Home prices have declined enough to be affordable to new borrowers; however, mortgage loans and banking services are difficult to access in rural areas. Dilapidated housing stock is contributing to rising vacancies and there is a demand for newer affordable housing in cities like Anchorage. Some agencies noted the need for additional funding for case management for new residents, and vouchers for affordable housing. There are a number of opportunities for banks to provide grants, investments in micro-loan funds for entrepreneurs, small business lending for refugees, and marketing and origination of affordable mortgages in rural markets. Other opportunities were bank volunteers for small business mentorships and financial literacy workshops, participation in the HUD 184 Lending Program, and sponsorship for non-profits to apply for the Federal Home Loan Bank of San Francisco Affordable Housing Program.

Scope of Evaluation in Alaska

A full-scope review of the Anchorage AA was conducted. KeyBank operated six branches in the AA, which was 42.9 percent of the bank's total number of branches in the state of Alaska. The bank had a 14.1 percent deposit market share, ranking fourth among all institutions in the AA. The top competitors included Wells Fargo Bank with 49.2 percent market share, First National Bank of Alaska with 21.9 percent market share and Northrim Bank with 14.8 percent market share. The AA represented 60.4 percent and 78.1 percent of the bank's total loans and deposits, respectively, in the state.

The remaining two AAs received limited-scope reviews. One of the two AAs is the Alaska non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Alaska

LENDING TEST

The bank's performance under the lending test in Alaska is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Anchorage AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Anchorage, AK MSA	247	219	4	8	478	60.4%	78.1%
AK Non-MSA Counties	111	121	9	2	243	30.7%	13.4%
Fairbanks, AK MSA	27	40	3	0	70	8.8%	8.5%
Total	385	380	16	10	791	100%	100%

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Anchorage, AK MSA	\$37,402	\$48,976	\$573	\$103,773	\$190,724	75.2%	78.1%
AK Non-MSA Counties	\$20,906	\$15,611	\$160	\$16,338	\$53,015	20.9%	13.4%
Fairbanks, AK MSA	\$4,102	\$5,802	\$57	\$0	\$9,961	3.9%	8.5%
Total	\$62,410	\$70,389	\$790	\$120,111	\$253,700	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked fourth in deposits with a 14.1 percent market share in the AA. In overall HMDA lending, the bank ranked 14th with a 1.5 percent market share. There was strong competition as reflected by the 172 other lenders in the AA. The top three lenders were Wells Fargo Bank with 49.2 percent market share, First National Bank of Alaska with 21.9 percent market share and Northrim Bank with 14.8 percent market share.

In small loans to businesses, KeyBank ranked 14th with a market share of 0.8 percent. There was strong competition in the market with 75 other lenders in the AA. The top three lenders were Bank of America with 26.5 percent market share, Wells Fargo Bank with 16.7 percent market share and American Express with 13.8 percent market share. Four of the top five small business lenders were nationwide lenders with large business credit card portfolios that captured over 66.7 percent of small loans to businesses.

In small loans to farms, KeyBank did not originate enough loans in the AA to allow for a meaningful analysis. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to table O in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is well below the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing and the percentage of loans by all lenders in moderate-income CTs. The bank's performance in 2016 is stronger than in 2017-2018. Equal emphasis is placed on the bank's performance in 2016, as 2017-2018. In 2016, there is a better percentage of loans for home mortgage lending and loans to small businesses and small farms.

Small Loans to Businesses

Refer to table Q in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's overall geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's overall borrower distribution of home mortgage loan originations and purchases is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and the percentage of loans by all lenders to low-income families. Given the median family housing value of \$259,483, it would be difficult for a low-income borrower who would earn less than \$44,633, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers is below the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is stronger than 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is adequate.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made eight CD loans in its AA for a total of \$103.8 million, which represents 88.9 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. KeyBank makes significant use of innovative and/or complex CD loans and involve the bank acting in a leadership role. The loans are responsive to the identified affordable housing and small business credit needs in the AA. KeyBank made two loans totaling \$80 million (77.1 percent) for the purpose of community services, three CD loans totaling \$11.5 million (11.1 percent) for the purpose of providing affordable housing and three CD loans totaling \$12.2 million (11.8 percent) for the primary purpose of economic development.

Examples of CD loans in the AA include:

KeyBank originated a \$35 million loan to an Alaska Native Corporation that supports its Alaskan Native shareholders in the preservation of their heritage and culture by offering shareholder development programs, benefits, and cultural, economic and social service programs.

KeyBank originated a \$2.2 million loan to fund construction of a downtown Anchorage project that consists of 50 housing units. Of the 50 units, 38 LIHTC-qualified units are set aside for those residents who earn 50 to 60 percent of the median income.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank, in addition to matching CD loans with CD LIHTC investments on a variety of projects, also has a dedicated team that works with Alaskan and other Native American tribes and communities to provide customized solutions to serve their specific credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Fairbanks AA and the non-MSA AA is consistent with the bank's overall performance under the lending test in the full-scope area. The performance in the limited-scope areas has a neutral impact on the bank's overall rating for the state.

Refer to tables O through T in the state of Alaska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Alaska is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Anchorage AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Anchorage, AK MSA	2	\$7,207	6	\$11,752	8	80%	\$18,959	66.6%	2	\$9,651
AK Non-MSA Counties	0	\$0	1	\$8,686	1	10%	\$8,686	30.5%	1	\$86
Fairbanks, AK MSA	1	\$807	0	\$0	1	10%	\$807	2.8%	0	\$0
Total	3	\$8,014	7	\$20,438	10	100%	\$28,452	100.0%	3	\$9,737

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Current and prior period investments totaled \$28.5 million and represented 16 percent of tier 1 capital allocated to the AA.

KeyBank created partnerships and provided grants to community organizations to provide emergency cold weather shelters for families, taxi rides to emergency shelters, food for emergency shelter inhabitants, and, in cases of extreme cold, transportation for children to attend school. The investments and grants reflect excellent responsiveness to the needs identified in the AA. The entirety of the CD investments supports affordable housing in the AA, which is an identified credit need. CD investments involve numerous complex projects including LIHTCs where the bank often acts in a leadership role and combined CD loans with CD investments in support of the projects.

Examples of CD investments in the AA include:

KeyBank provided a \$5.8 million LIHTC equity investment for new construction of a 29-unit apartment community located in the AA. Units are restricted to households earning 50 and 60 percent or less of the

area median income. All rent restricted units are underwritten at 5 percent below the LIHTC maximum. This development was also the recipient of \$96 thousand in Energy Tax Credits. In addition, KeyBank facilitated a \$6 million construction loan and a \$1.5 million permanent loan.

KeyBank provided a \$5.8 million LIHTC equity investment for the new construction of 50 units of housing comprised of 38 affordable housing units and 12 market rate units located in the AA. Thirty-eight units are restricted to residents with incomes at 50 and 60 percent of the area median income. In addition, four units are set aside for homeless residents and 10 units are set aside for special needs individuals. This development was also the recipient of \$58 thousand in energy tax credits.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Fairbanks AA and the non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area.

The performance in the limited-scope areas has a neutral impact on the overall investment test rating for the state of Alaska.

SERVICE TEST

The bank's performance under the service test in Alaska is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Anchorage AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Anchorage, AK MSA	78.1%	5	35.7%	0	20	60	20	3	23.6	51.6	21.8
AK Non-MSA Counties	13.4%	7	50%	0	0	71.4	28.6	0.3	4.5	60.8	34.4
Fairbanks, AK MSA	8.5%	2	14.3%	0	50	50	0	0	20.9	54.7	24.4
Total*	100%	14	100%								

*May not add up to 100 percent due to geographies with unknown (N/A) tract income level and rounding.

The bank maintains no branches in low-income geographies and one branch in moderate-income geographies. The branch distribution in moderate-income geographies is near to the percentage of the population in moderate-income CTs in the AA. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Anchorage, AK MSA	0	-1	-	-	-1	-
AK Non-MSA Counties	0	0	-	-	-	-
Fairbanks, AK MSA	0	0	-	-	-	-

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in middle-income geographies since the last evaluation. This branch closure did not impact the distribution of branches relative to the population residing in those geographies.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late each day and the vast majority of the branches had Saturday hours.

Community Development Services

The bank provides few CD services.

Employees provided their financial or job-specific expertise and/or technical assistance to an organization that provides affordable housing to LMI individuals and families. The service activities totaled eight hours.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the non-MSA AA is weaker than the bank's overall performance under the service test in the full-scope area due to poor branch distribution. The bank's performance in the Fairbanks MSA AA is stronger than the overall performance in the full-scope area due to excellent branch distribution. The bank's performance within the limited-scope AAs has a neutral impact on the overall service test rating for the state of Alaska.

State of Colorado

CRA rating for the State of Colorado:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Adequate distribution of loans by income level of the borrower
- Good distribution of loans among borrowers in different geographies
- Excellent level of qualified CD investments
- Adequate level of CD services
- Reasonably accessible service delivery systems to portions of the AA

Description of Bank's Operations in Colorado

The state of Colo. Represented KeyBank's fifth largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated three AAs within the state of Colo. Refer to appendix A for a complete description of each AA.

KeyBank had \$4.2 billion of deposits within the state of Colo. representing 4.2 percent of adjusted deposits. The bank ranked fifth out of 95 institutions with a 3.8 percent market share. The top four depository institutions included Wells Fargo Bank with 24.7 percent market share, U.S. Bank with 13.5 percent market share, First Bank with 12.7 percent market share and Chase Bank with 12.6 percent market share. These competitors combined for over 63 percent of the total deposit market share. KeyBank operated 59 branches and 75 ATMs within its AAs, representing 5 percent of the bank's branches and 5 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$1.7 billion in loans, or 8.5 percent of the total bank loan originations and purchases, during the evaluation period.

DENVER-AURORA CSA

The Denver-Aurora CSA was the only AA selected for a full-scope review. As shown in table A below, the CSA includes the Denver-Aurora-Lakewood MSA and the Boulder MSA.

Demographic Data

Table A provides a summary of the demographics that includes housing and business information for the Denver-Aurora CSA. The area's median housing value in the CSA is 3.6 times the Denver-Aurora-Lakewood median income but 4.5 times moderate-income levels and 7.3 times low-income levels. This indicates that a limited proportion of owner-occupied housing units are affordable to LMI families.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2017-2018 Denver-Aurora, CO CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	673	8.3	23.9	33.6	33.0	1.2
Population by Geography	2,959,219	8.6	24.2	33.8	33.4	0.1
Housing Units by Geography	1,202,662	8.3	23.6	35.2	32.8	0.0
Owner-Occupied Units by Geography	716,247	4.5	18.8	35.1	41.5	0.0
Occupied Rental Units by Geography	425,829	14.3	31.6	35.3	18.8	0.0
Vacant Units by Geography	60,586	11.2	25.1	35.7	28.0	0.0
Businesses by Geography	338,539	6.3	19.5	32.9	41.0	0.3
Farms by Geography	6,840	7.0	19.2	33.9	39.5	0.3
Family Distribution by Income Level	715,893	21.5	17.4	20.3	40.8	0.0
Household Distribution by Income Level	1,142,076	23.8	16.4	17.9	41.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$293,480
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,089
			Families Below Poverty Level			7.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Denver-Aurora-Lakewood MSA

Based on data from the August 2018 Moody's Analytics report, the Denver-Aurora-Lakewood MSA economy was strengthening. Job growth rose above the average for the West Region Mountain census division, which was the top performing division at that time. A rebound in the energy industry contributed to the growth, and an extremely tight labor market made rapid job growth especially notable. The high demand for jobs caused Denver's average hourly earnings to rise rapidly. The largest employers in the Denver Aurora-Lakewood MSA included HealthOne, University of Colorado Hospital, and Lockheed Martin. According to the U.S. BLS, the unemployment rate fluctuated slightly throughout the evaluation period, averaging 3.1 percent in 2016, 2.7 percent in 2017 and three percent in 2018. The unemployment rate in the MSA was slightly lower than the overall state of Colo. unemployment rate which averaged 3.3 percent, 2.8 percent and 3.2 percent during the same respective periods.

Denver's booming economy drove up house prices and rents significantly faster than incomes. According to the FHFA House Price Index, prices in Denver climbed 65 percent over five years, and affordability was at a multi-decade low. As house values plateaued and the tight labor market pushed faster wage growth, affordability was expected to stabilize late in 2018 and edge modestly higher in 2019.

Boulder MSA

According to the March 2019 Moody's Analytics report, Boulder was adding jobs faster than the overall state of Colo. The rapid pace of net hiring was especially notable given Boulder's relatively mature business cycle and tight labor market. The professional services industry was the largest driver behind recent gains, but the construction and leisure/hospitality industries also contributed. The largest employers in the Boulder MSA included the University of Colorado, GlobalFoundries and Level 3 Communication. According to the U.S. BLS, the unemployment rate fluctuated slightly throughout the evaluation period, averaging 2.7 percent in 2016, 2.4 percent in 2017 and 2.7 percent in 2018. The unemployment rate in the AA was slightly lower than the overall state of Colo. unemployment rate which averaged 3.3 percent, 2.8 percent and 3.2 percent during the same respective periods.

Rapid house price gains over the past four years left Boulder's housing market severely overvalued. Median house price growth was gradually slowing but dollar gains over the past year were still among the highest in the country. Single family housing affordability ranked among the bottom five percent of metro areas nationally and was at a three-decade low.

Community Contacts

This analysis takes into consideration comments provided by two community contacts serving the bank's Denver-Aurora CSA. The contacts were with a housing authority and a local chamber of commerce. The contacts noted that Colo. is the ninth fastest growing state by population, and job growth is outpacing net migration. As a result, there is an inflationary housing market and both rents and home prices are increasing significantly. The gap between housing costs and income growth is widening. Steep home prices have quickly priced first-time homebuyers out of the market.

Affordable housing remains a concern in the metro area. Housing is increasingly becoming unaffordable for LMI families and individuals. Only 47 percent of housing inventory was available to LMI borrowers in 2019 compared with 64 percent in 2016. Opportunities present themselves in supporting LMI housing developments and working with affordable housing organizations to make homeownership attainable for LMI individuals.

Scope of Evaluation in Colorado

A full-scope review of the Denver-Aurora AA was conducted. KeyBank had 50 branches in the AA, which was 84.7 percent of the bank's total number of branches in the state of Colo. The bank had a 4.2 percent deposit market share, ranking fifth among all institutions in the AA. The top four competitors included Wells Fargo Bank with 25.5 percent market share, U.S. Bank with 14.4 percent market share, FirstBank with 13.5 percent market share and Chase Bank with 12.7 percent market share. The AA represented 86.9 percent and 94.2 percent of the bank's total loans and deposits, respectively, in the state.

The remaining two AAs received limited-scope reviews. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Colorado

LENDING TEST

The bank's performance under the lending test in Colo. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver-Aurora AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Denver-Aurora, CO CSA	2,088	1987	7	26	4108	86.9%	94.2%
Colorado Springs	190	138	1	3	332	7%	2.1%
Fort Collins	182	102	1	0	285	6.1%	3.7%
Total	2,460	2,227	9	29	4,725	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Denver-Aurora, CO CSA	\$907,192	\$202,602	\$190	\$268,899	\$1,378,883	80.6%	94.2%
Colorado Springs	\$184,299	\$20,728	\$44	\$21,500	\$226,571	13.2%	2.1%
Fort Collins	\$97,330	\$8,369	\$30	\$0	\$105,729	6.2%	3.7%
Total	\$1,188,821	\$231,699	\$264	\$290,399	\$1,711,183	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked fifth out of 95 institutions in deposit market share with \$3.9 billion in total deposits in the AA, representing 4.2 percent of total market deposits. In overall HMDA lending, KeyBank ranked 34th with a 0.8 percent market share. There was strong competition among mortgage lenders with 823 institutions. The three top lenders were Wells Fargo Bank with a 6.8 percent market share, Chase Bank with a 4.8 percent market share, and U.S. Bank with a 3.8 percent market share.

In small loans to businesses, KeyBank ranked 14th with a market share of 0.8 percent. There was strong competition among lenders as reflected by the 212 lenders in the AA. The top three lenders in this market were Chase Bank with a market share of 24.2 percent, American Express with a market share of 15.1 percent, and Wells Fargo Bank with a market share of 11.8 percent.

The level of small loans to farms is not sufficient for 2017-2018 to provide meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Equal emphasis was placed on the bank's performance in 2016 and 2017-2018 as 2016 had stronger performance for home mortgage lending.

Home Mortgage Loans

Refer to table O in the state of Colo. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution in the AA.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below the percentage of owner-occupied housing in low-income CTs and well below the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is near to the percentage of owner-occupied housing in moderate-income CTs and near to the percentage of loans by all lenders in moderate-income CTs. The 2016 performance is stronger than the performance in 2017-2018 and this strength positively impacted the rating for this product.

Small Loans to Businesses

Refer to table Q in the state of Colo. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. The bank's performance in 2016 is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Colo. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate enough loans to perform a meaningful analysis for small loans to farms during 2017-2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Colo. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and exceeded the percentage of loans by all lenders to low-income families. Housing affordability in the AA is a concern, with the median home price of \$293,480 exceeding the maximum low-income household income of \$40,410 by more than seven times. The percentage of home mortgage loans to moderate-income borrowers is below both the distribution of moderate-income families and the percentage of loans by all lenders to low-income families. As stated above, house affordability in the AA adversely affects the ability for moderate-income families to afford to purchase a home in this AA. The bank's performance in 2016 is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Colo. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (those businesses with revenues of \$1 million or less) is well below the percentages of small businesses in the AA and exceeds the percentage of loans by all lenders to small businesses in the AA. The 2016 performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Colo. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate enough loans to perform a meaningful analysis for small farms during 2017-2018.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA was excellent. The bank originated 26 loans totaling \$269 million, which represents 54 percent of tier 1 capital allocated to the AA. Of these loans, twenty-three, totaling \$263 million, benefited 12 affordable housing organizations. Three loans, totaling \$6 million, benefited three different economic development organizations.

Examples of CD Loans include:

The bank originated a \$13.10 million loan to fund the development of a 216-unit apartment building. The project was financed using tax-exempt bonds and supported by LIHTC. The project targets general occupancy households and individuals with incomes up to 60 percent of the area median income.

The bank originated a \$30 million loan to renew an existing line of credit for a local housing authority. The housing authority funds and supports projects that increase the availability of affordable housing within the AA.

The bank originated a \$10.8 million loan to fund a 152-unit affordable housing project. This development provides housing for households and families with incomes between 30 and 60 percent of the area median income.

The bank originated a \$3 million loan to fund the construction of a 152-unit affordable housing project in Lakewood, CO. This project replaces an existing seven story office building and is for the construction of a new four story building adjacent to it.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. KeyBank creates flexible lending products that meet the financial needs of local housing authorities and small businesses. As noted in the overall description of bank, the bank has created several first-time home buyer programs and LMI deposit products to assist LMI families in saving for, and purchasing, their own homes.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Colorado Springs AA and the Fort Collins AA is stronger than the bank's overall performance under the lending test in the full-scope area during 2017-2018 and weaker during 2016. In 2017-2018, performance among borrowers of different incomes for home mortgage and small business loans was stronger in the limited-scope AAs than the full-scope AA. In 2016, performance among borrowers of different incomes for home mortgage loans was weaker for the limited-scope AAs.

The performance in the limited-scope areas had a neutral impact on the overall lending test rating for the state of Colo.

Refer to tables O through T in the state of Colo. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Colo. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver-Aurora CSA AA is excellent.

The bank has an excellent level of qualified CD investments and grants (occasionally in a leadership position), particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments through LIHTC projects and economic development projects and initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Denver-Aurora CO CSA	14	\$31,650	9	\$53,289	23	88.5%%	\$84,939	95.7%	11	\$35,382
Colorado Springs	1	\$2,128	0	\$0	1	3.8%	\$2,128	2.4%	1	\$0
Fort Collins	1	\$400	1	\$1,300	2	7.7%	\$1,700	1.9%	1	\$1,067
Total	16	\$34,178	6	\$54,217	26	100.0%	\$88,767	100.0%	13	\$36,449

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Prior and current period investments total 17.7 percent of the bank's tier 1 capital allocated to the AA. The bank made nine investments totaling \$53.3 million during the evaluation period. Of the investments made during the evaluation period, the bank invested \$52.9 million in affordable housing funds that invest in affordable housing or support LIHTC developments. These investments include an additional \$35.4 million in unfunded commitments to invest that will further support affordable housing, which is a significant concern in the Denver-Aurora, CO CSA. In addition, the bank had 14 prior period investments totaling \$31.7 million, similarly focused on affordable housing funds. The bank made one economic development investment totaling \$350 thousand. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

In addition to its investments, the bank also made four grants and donations totaling \$372,500 to organizations that support CD projects that support LMI geographies, families, and individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Fort Collins MSA and Colorado Springs MSA is consistent with the bank's overall performance under the investment test in the full-scope area.

SERVICE TEST

The bank's performance under the service test in Colo. is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank's performance in the Denver-Aurora AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Denver-Aurora CSA	94.3%	50	84.7%	2%	16%	40%	42%	8.6%	24.2%	33.8%	33.4%
CO Springs MSA	2%	4	6.8%	0%	25%	50%	25%	4.7%	26.8%	39.7%	27.4%
Ft Collins MSA	3.7%	5	8.5%	0%	60%	20%	20%	3.5%	25.8%	48.8%	21.9%

The bank's distribution of branches in low-income CTs is well below the distribution of the population living in those areas. The distribution of branches in moderate-income CTs is below the distribution of the population living in those areas. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 75 ATMs in the AA.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Denver-Aurora, CO CSA	0	5	0	-3	-2	0
Colorado Springs MSA	0	0	0	0	0	0
Fort Collins MSA	0	0	0	0	0	0

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open any branches and closed five branches. No branches were closed in low-income CTs and three branches were closed in moderate-income CTs. These closures were due to consolidations of duplicative branches in the AA.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Services were comparable among locations regardless of the income level of the CT. Most branch offices had extended hours on Fridays and offered Saturday hours.

Community Development Services

The bank provides an adequate level of CD services.

Four KeyBank employees were actively involved during the evaluation period by providing financial education, technical assistance or serving on boards and committees. The employees devoted approximately 64 hours to four organizations, including serving on boards of directors, providing financial services to assist LMI individuals with tax preparation services or teaching financial literacy to LMI persons. The organizations provide various community services that target LMI persons and households as well as support affordable housing initiatives.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Colorado Springs AA and the Fort Collins AA was stronger than the bank's overall performance under the service test for the full-scope area. This occurred due to a strong distribution of branches among moderate-income geographies.

The performance in the limited-scope areas had a neutral impact on the overall service test rating for the state of Colo.

State of Connecticut

CRA rating for the State of Connecticut:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good lending activity
- Excellent distribution of loans by income level of the borrower
- Poor distribution of loans by geography
- Leader in CD lending
- Excellent level of qualified CD investments
- Accessible service delivery systems to portions of the AA
- Low level of CD services

Description of Bank's Operations in Connecticut

The state of Conn. Represents KeyBank's sixth largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated four AAs within the state of Conn. Refer to appendix A for a complete description of each AAs.

KeyBank had \$4.3 billion of deposits within these AAs representing four percent of adjusted deposits. In Conn., KeyBank ranks eighth out of 61 depository institutions with a 3.2 percent market share. The top bank within the AAs in terms of deposits was Bank of America with 23.6 percent market share. KeyBank operated 63 branches in Conn. and 65 ATMs, of which 60 were deposit-taking. Branches and ATMs represented 5.3 percent of the bank's branches and 4.3 percent of the bank's ATMs. As was compared above regarding the percentage of deposits and branching activities for the total bank, KeyBank originated and purchased approximately \$892.3 million in loans, or 1 percent of total bank loan originations and purchases, during the evaluation period.

HARTFORD-WEST HARTFORD-EAST HARTFORD MSA

The Hartford-West Hartford-East Hartford MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the MSA. The median housing value of owner-occupied housing units was 5.4 times the MSA annual income of low-income families and 3.4 times that of moderate-income families in the MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Hartford, CT MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	290	15.9	14.8	36.6	30.7	2.1
Population by Geography	1,214,056	12.5	14.1	37.7	34.3	1.3
Housing Units by Geography	507,998	13.2	14.9	39.3	32.6	0
Owner-Occupied Units by Geography	313,532	3.7	10.9	42.5	42.8	0
Occupied Rental Units by Geography	153,414	29.5	22.5	33.3	14.7	0.1
Vacant Units by Geography	41,052	24.3	17.2	37.1	21.4	0.1
Businesses by Geography	92,484	9.6	12.1	40.6	37.3	0.4
Farms by Geography	2,982	2.8	8.0	41.0	48.1	0
Family Distribution by Income Level	306,718	22.3	16.5	20.7	40.5	0
Household Distribution by Income Level	466,946	25.7	14.8	17.3	42.2	0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$88,016	Median Housing Value			\$238,867
			Median Gross Rent			\$1,005
			Families Below Poverty Level			7.7%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the September 2018 Moody's Analytics report, the Hartford-West Hartford-East Hartford metro area was adding jobs at its fastest pace in more than half a decade. Year-ago growth in payroll employment surpassed the Northeast average. The private sector drove the rebound, with the bulk of the gains in business/professional services, healthcare and manufacturing. The public sector was rapidly cutting jobs. Payrolls in core financial services were flat. Major employers in the MSA included Hartford HealthCare, Pratt & Whitney/United Technologies, University of Connecticut, the Travelers Company and Hartford Financial Services Group. According to the U.S. BLS, the unemployment rate fell slightly over the evaluation period, averaging 5.2 percent in 2016, 4.7 percent in 2017 and 4.1 percent in 2018. The unemployment rate in the AA was slightly higher than the overall state of Conn. unemployment rate which averaged 4.8 percent, 4.6 percent and 3.8 percent during the same respective periods.

Community Contacts

The analysis considers comments provided by two community organizations serving the Hartford-West Hartford-East Hartford MSA and from the city of Hartford. The organizations represented affordable housing and small business development agencies serving LMI communities. The city of Hartford conducted a residential survey, as part of its HUD Consolidated plan, and noted that among housing needs, a high percentage of respondents indicated a need for energy efficiency improvements, a need for homebuyer assistance, funds for major home improvements and funds for emergency repairs. More than

a quarter (29 percent) of very low-income residents have severe cost-burdens paying more than 50 percent of their income on housing, including utilities.

There is the need in the area for an increase in the homeownership rate, increased downtown housing, and preservation and rehabilitation of Hartford's old housing stock. The MSA would benefit from the creation of a continuum of housing options for a range of incomes. It was noted that code enforcement aimed at increasing the safety and condition of housing, and strategic elimination of vacant buildings and blighted lots, is needed. Opportunities for banks include providing credit for small businesses, contractors, restaurants, small stores and small commercial strips that operate in urban centers throughout Conn. Also, there is a need for consumer credit and debt consolidation programs in the area. Affordable rental housing, home rehabilitation loans, home mortgages and small business loans represent primary credit needs for the MSA.

Scope of Evaluation in Connecticut

A full-scope review of the Hartford AA was conducted. KeyBank had 32 branches in the AA, which was 50.8 percent of the bank's total number of branches in the state of Conn. The bank had a 4.1 percent deposit market share, ranking eighth among all institutions in the AA. The top competitors included Bank of America with 43.7 percent market share, Webster Bank with 9.7 percent market share, United Bank with 8.1 percent market share, and TD Bank with a market share of 6.6 percent. The AA represented 42 percent and 43.8 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited-scope reviews. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Connecticut

LENDING TEST

The bank's performance under the lending test in Conn. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford-West Hartford-East Hartford AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Hartford	755	933	13	2	1,703	42.1	44.1
Bridgeport	284	333	0	5	622	15.4	6.2
New Haven	725	790	6	5	1,526	37.7	46.9
Worcester	97	93	4	2	196	4.8	2.8
Total	1,861	2,149	23	14	4,047	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Hartford	\$254,690	\$76,450	\$173	\$19,860	\$351,173	39.4	44.1
Bridgeport	\$137,794	\$27,255	\$0	\$28,493	\$193,542	21.7	6.2
New Haven	\$200,415	\$50,801	\$230	\$66,151	\$317,597	35.6	46.9
Worcester	\$14,885	\$7,357	\$500	\$7,216	\$29,958	3.4	2.8
Total	\$607,784	\$161,863	\$903	\$121,720	\$892,270	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked eighth in deposits with a 4.1 percent market share in the AA. In overall HMDA lending, KeyBank ranked 16th with a 1.9 percent market share. There was strong competition as reflected by the 180 other lenders and 28 other depository institutions in the AA. The top three lenders were Idaho Central with 13.8 percent market share, Eagle Bank and Trust Company with 10.1 percent market share and Wells Fargo Bank with 9 percent markets share.

In small loans to businesses, KeyBank ranked 13th with a market share of 1.5 percent in the AA. There was strong competition in the market with 49 other lenders. The top three lenders were American Express with 18.5 percent market share, Chase Bank with 12.5 percent market share, and the Bank of Commerce with 11.4 percent market share. Five of the top six small business lenders were nationwide lenders with large business credit card portfolios that together captured over 55.8 percent of the small loans to businesses.

In small loans to farms, KeyBank did not originate enough loans in the AA to allow for a meaningful analysis. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of Conn. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects poor distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is well below both the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is well below the percentage of owner-occupied housing and below the percentage of loans by all

lenders in moderate-income CTs. In 2016, KeyBank did not originate or purchase enough mortgage loans in the AA to allow for a meaningful analysis.

Small Loans to Businesses

Refer to table Q in the state of Conn. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is below both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs and near to the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Conn. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. Given the median family housing value of \$238,867, it would be difficult for a low-income borrower, who would earn less than \$44,008, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers exceeds both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, KeyBank did not originate or purchase enough mortgage loans in the AA to allow for a meaningful analysis.

Small Loans to Businesses

Refer to table R in the state of Conn. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made two CD loans in the AA for a total of \$19.9 million, which represents over 8.3 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. The bank makes use of innovative and/or complex CD loans, involving many complex projects where the bank often acted in a leadership role. Both of the loans were for the primary purpose of affordable housing.

An example of a CD loan in the AA includes:

KeyBank provided \$16.9 million in financing for the first phase of a six-phase project that provides 438 housing units. The first phase has 60 affordable units and 15 market rate units in six buildings. Of the 60 affordable units, 15 of these are designated for individuals and families with incomes at or below 25 percent of area median income (AMI), 30 will be designated for individuals and families with incomes between 25 and 50 percent of AMI and 15 units will be designated for families with incomes between 50 and 60 percent of AMI. The 15 units at 25 percent of AMI will be supportive housing units targeted towards tenants.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the New Haven-Milford MSA and Worcester MSA is consistent with the bank's overall performance under the lending test in the full-scope area. The bank's performance in the Bridgeport-Stamford-Norwalk MSA is weaker than the performance in the full-scope area due to poorer geographic and borrower distributions.

The performance in the limited scope areas had a neutral impact on the overall investment test conclusion.

Refer to tables O through T in the state of Conn. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Conn. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford-West Hartford-East Hartford AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford	0	0	4	24,040	4	36.4	24,040	78.9	3	5,892
Bridgeport	1	1,031	3	343	4	36.4	1,374	4.5	1	954
New Haven	1	1,385	2	3,660	3	27.3	5,045	16.6	2	3,168
Worcester	0	0	0	0	0	0	0	0	0	0
Total	2	2,416	9	28,043	11	100	30,459	100	6	10,014

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 10.3 percent of tier 1 capital allocated to the AA. The investments reflect excellent responsiveness to the needs identified in the AA, including affordable housing. Two investments were LIHTC investments that produced 81 affordable housing units. The remaining two investments were in SBICs related to economic development.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies and/or real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$3.5 million LIHTC investment in an affordable housing development, which also provides programs and supportive housing for the homeless. This development includes 24 one-bedroom units. Four of the units are dedicated to supportive housing, 17 units are affordable rent and three are market-rate units.

KeyBank provided \$16 million in LIHTC, in addition to the \$16.9 million in financing mentioned under the lending test. The investment was for the first phase of a six-phase project that provides 438 housing units. The first phase has 60 affordable units and 15 market rate units in six buildings. Of the 60 affordable units, 15 of these are designated for individuals and families with incomes at or below 25 percent of AMI, 30 are designated for individuals and families with incomes between 25 and 50 percent of AMI, and 15 units are designated for families with incomes between 50 and 60 percent of AMI. The 15 units at 25 percent of AMI are supportive housing units targeted towards tenants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the New Haven AA is near to the bank's overall performance under the investment test in the full-scope area based on the total investments (\$5 million) and the unfunded commitments (\$3.2 million). The bank's performance in the Bridgeport AA and Worcester AA is weaker than the bank's overall performance under the investment test in the full-scope area due to lower levels of qualified investments.

The performance in the limited scope areas had a neutral impact on the overall investment test conclusion.

SERVICE TEST

The bank's performance under the service test in Conn. is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford-West Hartford-East Hartford AA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the Hartford AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Hartford	44.1	32	50.8	3.1	18.8	56.3	21.9	12.5	14.1	37.8	34.3
Bridgeport	6.2	7	11.1	14.3	0	42.9	42.9	12.6	20.6	29.9	36.8
New Haven	46.9	21	33.3	9.5	9.5	47.6	33.3	13.1	22.0	29.4	35.1
Worcester	2.8	3	4.8	0	66.7	33.3	0	12.2	20.1	60.5	7.2

The bank's distribution of the Hartford AA branches in low-income geographies is well below, and in moderate-income geographies exceeds, the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 34 ATMs in the Hartford AA, of which 30 were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hartford	0	3	-	-	-	-3
Bridgeport	0	1	-	-	-1	-
New Haven	0	6	-	-	-2	-4
Worcester	0	2	-	-	-2	-

To the extent changes have been made, the bank's opening and closing of branches in the AA has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open any branches during the evaluation period. The bank closed three branches in the AA but none were in LMI CTs.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. All but three branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The bank provides few, if any CD services.

One employee provided two hours of CD services. The employee assisted on developing loan applications and underwriting standards for use by LMI customers of a Community Development Financial Institution (CDFI).

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Bridgeport AA, New Haven AA and Worcester AA is consistent with the bank's overall performance under the service test in the full-scope area.

State of Florida

CRA rating for the State of Florida:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Adequate lending activity
- Adequate distribution of loans by borrower profile
- Poor geographic distribution of loans
- Poor CD loans activity
- Good level of investments that are responsive to AA needs
- Reasonably accessible retail delivery systems to portions of the AA
- Adequate CD services

Description of Bank's Operations in Florida

The state of Fla represents KeyBank's 10th rated area out of 19 rating areas, in terms of deposits. KeyBank delineated two AAs within the state of Fla. Refer to appendix A for a complete description of each AA.

KeyBank has \$2.9 billion of deposits within its two AAs representing 2.7 percent of adjusted deposits. KeyBank ranked 10th out of 68 depository institutions with a 3.4 percent market share. The top three banks within these AAs in terms of deposits were Wells Fargo Bank with 16.6 percent market share, Bank of America with 15.6 percent market share and Chase Bank with 8.6 percent market share. KeyBank operated three branches and no ATMs within Fla., representing 0.3 percent of the bank's branches and 0 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$327.3 million in loans, or 0.4 percent of total bank loan originations and purchases, during the evaluation period. KeyBank's strategic focus in its two AAs is to serve Key Private Bank (KPB) customers exclusively. As a result, KeyBank had limited branch presence and retail product delivery in Fla, which we considered when determining our conclusions.

CAPE CORAL-FORT MEYERS-NAPLES CSA

The Cape Coral-Fort Meyers-Naples CSA was the only AA selected for a full-scope review. As shown in table A below, the CSA includes the Cape Coral-Fort Myers MSA and the Naples-Immokalee-Marco Island MSA.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Cape Coral-Fort Meyers-Naples CSA. The median housing value of owner-occupied housing units is 8.5 times the MSA annual income of low-income families and 5.3 times that of moderate-income families in the CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Cape Coral, FL CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	241	5.4	23.7	35.7	34.0	1.2
Population by Geography	1,004,766	5.5	25.9	40.8	27.8	0
Housing Units by Geography	575,915	3.5	20.2	39.9	36.3	0
Owner-Occupied Units by Geography	267,895	2.1	17.8	43.2	36.9	0
Occupied Rental Units by Geography	114,280	8.8	31.4	37.9	21.8	0
Vacant Units by Geography	193,740	2.3	17.0	36.4	44.2	0
Businesses by Geography	120,764	2.8	18.8	39.8	38.5	0.1
Farms by Geography	3,728	4.0	23.7	45.7	26.5	0
Family Distribution by Income Level	253,300	20.8	18.2	19.5	41.5	0
Household Distribution by Income Level	382,175	22.5	17.2	18.7	41.7	0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$57,627	Median Housing Value			\$246,568
Median Family Income MSA - 34940 Naples-Immokalee-Marco Island, FL MSA		\$66,264	Median Gross Rent			\$1,007
			Families Below Poverty Level			10.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Cape Coral-Fort Meyers MSA

Based on data from the December 2018 Moody's Analytics report, Cape Coral's economy was improving steadily and regaining ground lost due Hurricane Irma (2017). Cape Coral added jobs at a faster rate than the rest of Fla. and the U.S. in the second half of 2018. Job improvement was broad-based, but led by construction, which was responsible for two-fifths of net new jobs year-over-year. The largest employers in the Cape Coral MSA included Lee Memorial Health System, Publix Super Markets and Wal-Mart Stores. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 4.6 percent in 2016, 4.1 percent in 2017 and 3.5 percent in 2018. The unemployment rate in the Cape Coral MSA was near to the overall state of Fla unemployment rate which averaged 4.8 percent, 4.2 percent and 3.6 percent during the same respective periods.

Median single-family housing prices more than tripled from the bottom reached in 2011. The pace slowed in 2018, which not only safeguarded against another housing bubble but also boded well for the MSA's position as an affordable alternative to other desirable, affluent southwest Fla areas.

Naples-Immokalee-Marco Island MSA

Based on data from the December 2018 Moody's Analytics report, Naples' economy was also hurt by Hurricane Irma. Total employment increased throughout 2018 but failed to return to its pre-hurricane

level. Payrolls in the industry remained flat in the months after Irma due likely to diminished demand among residents; however, a brief slowdown in tourism could be partly to blame. Many residents were still rebuilding and, despite insurance payouts and government aid, likely had to dedicate a portion of their earnings to recovery efforts, leaving fewer funds available for discretionary spending. The largest employers in Naples included Publix Super Markets, Naples Community Hospital and Wal-Mart Stores. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 4.6 percent in 2016, 4.2 percent in 2017 and 3.5 percent in 2018. The unemployment rate in the Naples MSA was near to the overall state of Fla unemployment rate which averaged 4.8 percent, 4.2 percent and 3.6 percent during the same respective periods. The housing market was showing small gains year-over-year. Single-family permits were increasing, fueled by several years of above-average house price appreciation.

Community Contacts

The analysis takes into consideration comments provided by two community contacts serving the bank's Cape Coral AA. The contacts were with a publicly funded economic development agency in Lee County and a housing agency focusing on veterans, seniors and disabled individuals within Lee County. The economic development agency contact noted that the local economy in Lee County is generally strong. Lee County is a relatively affluent area and has inflated the price of housing which restricts the supply of affordable housing units in the area. The housing agency contact stated that many people are in the low-income group earning below 30 percent of the area MFI. Many households are underbanked. The contacts indicated that there is a continued need for small business lending as well as affordable housing loans and project support. Opportunity exists to originate these types of loans throughout the AA, but are limited in the low-income geographies due to the small proportion of owner-occupied units and small businesses, coupled with limited home affordability for LMI individuals. There are opportunities within LMI areas to provide age-friendly banking accounts and financial literacy training and coaching.

Scope of Evaluation in Florida

A full-scope review of the Cape Coral-Fort Meyers-Naples AA was conducted. KeyBank had two branches in the AA, which was 66.7 percent of the bank's total number of branches in the state of Fla. The bank had an 8.6 percent market share, ranking fourth among all institutions in the AA. The top competitors included Wells Fargo Bank with 13 percent market share, Bank of America with 12.5 percent market share and Fifth Third Bank with 10.6 percent market share. The AA represented 78.5 percent and 99.8 percent of total loans and deposits, respectively, in the state.

The bank's other AA, West Palm Beach MSA, received a limited-scope review. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Florida

LENDING TEST

The bank's performance under the lending test in Fla is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cape Coral-Fort Meyers-Naples AA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cape Coral CSA	136	12	0	1	149	77.6%	99.8%
West Palm Beach MSA	30	13	0	0	43	22.4%	0.2%
Total	166	25	0	1	192	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cape Coral CSA	\$239,191	\$2,113	\$0	\$4,160	\$245,464	75%	99.8%
West Palm Beach MSA	\$77,139	\$4,736	\$0	\$0	\$81,875	25%	0.2%
Total	\$316,330	\$6,849	\$0	\$4,160	\$327,339	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

KeyBank's strategic focus of providing loan products exclusively to its KPB clientele reflects the low volume of lending in this AA.

KeyBank ranked fourth in deposits with an 8.6 percent market share in the AA. In overall HMDA lending, KeyBank ranked 101st with 0.2 percent market share. This is due to the bank's strategic focus on serving the KPB clientele exclusively. There was strong competition as reflected by the 958 lenders and 42 depository institutions in the AA. The three top lenders in this market were Wells Fargo Bank with 8.4 percent market share, Quicken Loans with 5.2 percent market share and Suncoast Credit Union with 4.7 percent market share.

In small loans to businesses, KeyBank ranked 74th with a market share of 0.1 percent. There was competition as reflected by the 176 lenders in the AA. The three top lenders in this market were American Express with 20.7 percent market share, Bank of America with 11.7 percent market share and Chase Bank with 11 percent market share.

In small loans to farms, KeyBank did not originate enough loans in the Cape Coral AA to allow for a meaningful analysis. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units within the AA.

Home Mortgage Loans

Refer to table O in the state of Fla. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is adequate.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is significantly below the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is well below the percentage of owner-occupied housing, and significantly below the percentage of loans by all lenders in moderate-income CTs. In 2016, KeyBank's performance in low-income CTs is stronger than 2017-2018 and the bank's performance in moderate-income CTs is consistent with 2017-2018 performance. In 2016, the bank's performance is stronger than 2017-2018 and enhances the overall geographic distribution rating for home mortgage loans.

Small Loans to Businesses

Refer to table Q in the state of Fla section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank did not originate a sufficient number of loans to small businesses to conduct a meaningful analysis.

Small Loans to Farms

Refer to table S in the state of Fla section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank did not originate a sufficient number of loans to small farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Fla. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is significantly below distribution of low-income families and is near to the percentage of loans by all lenders to low-income

families. Given the median family housing value of \$246,568, it would be difficult for a low-income borrower, who would earn less than \$28,813, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers is significantly below both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income borrowers. In 2016, KeyBank's performance for low-income borrowers is stronger than 2017-2018 and the bank's performance for moderate-income borrowers is consistent with 2017-2018 performance. In 2016, the bank's performance is stronger than 2017-2018 and enhances the overall geographic distribution rating for home mortgage loans.

Small Loans to Businesses

Refer to table R in the state of Fla. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank did not originate a sufficient number of loans to small businesses to conduct a meaningful analysis.

Small Loans to Farms

Refer to table T in the state of Fla. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank has made a low level of CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Cape Coral AA is poor. KeyBank originated one CD loan in the AA for a total of \$4.2 million, which represents 1.1 percent of tier 1 capital allocated to the AA. CD lending performance has a neutral impact on the lending test rating. The CD loan was originated to construct a LIHTC affordable housing development located in Naples with 100 percent of the 51-units restricted to LMI individuals.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the lending test in the West Palm Beach-Boca Raton-Delray Beach AA is stronger than the bank's overall performance under the lending test in the full-scope area due primarily to the excellent geographic distribution of HMDA loans in LMI geographies.

The performance in the limited scope area had a neutral impact on the overall lending test conclusion.

Refer to tables O through T in the state of Fla. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in the state of Fla. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cape Coral-Fort Meyers-Naples AA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cape Coral CSA	3	\$14,442	1	\$1,000	4	50%	\$15,442	70.9%	4	\$2,555
West Palm Beach MSA	2	\$834	2	\$5,500	4	50%	\$6,334	29.1%	3	\$5,359
Total	5	\$15,276	3	\$6,500	8	100%	\$21,776	100%	7	\$7,914

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 4.2 percent of tier 1 capital allocated to the AA.

The investments and grants reflect good responsiveness to the needs identified in the AA, including affordable housing. All of the bank's current and prior period investments focused on affordable housing, which is a primary credit need in the AA.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

An example of CD investments in the AA includes:

KeyBank invested \$1 million for the construction of a 51-unit LIHTC affordable housing development. The units are restricted to LMI income. This LIHTC is part of a larger \$9.5 million investment with a real estate corporation that provides investment opportunities within KeyBank's footprint and invests in affordable housing in rural and underserved communities.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the investment test in the West Palm Beach-Boca Raton-Delray Beach AA is stronger than the bank's overall performance under the investment test in the full-scope area due to a more significant volume of CD investments.

The performance in the limited scope area had a positive impact on the overall investment test conclusion.

SERVICE TEST

The bank's performance under the service test in the state of Fla. is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cape Coral-Fort Meyers-Naples AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cape Coral CSA	99.8	2	66.7	0	0	0	100	5.5	25.9	40.8	27.8
West Palm Beach MSA	0.2	1	33.3	0	0	100	0	7.3	27.5	30.9	33.9

* May not add up to 100 percent due to geographies with unknown tract income level and rounding.

Performance in the Cape Coral AA is adequate due to the bank's strategic focus of serving KPB clients exclusively. The bank's distribution of branches in low- and moderate-income geographies is significantly below the percentage of the population living within those geographies. The bank does not

offer retail services to the general public, so KeyBank's distribution of banking offices is inaccessible to portions of the AA, particularly to low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cape Coral CSA	0	0	0	0	0	0
West Palm Beach MSA	0	0	0	0	0	0

The bank did not open or close any branches during the review period. Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals.

Both branches in the AA were open on weekdays and with specific hours during traditional business timeframes. KeyBank's strategic focus for these branch locations was to provide services exclusively to its high net worth clientele and not all bank retail services were available at these locations.

Community Development Services

The bank provides an adequate level of CD services.

KeyBank employees provided five organizations with 180 hours of service through seven CD service activities. The majority of these activities were affordable housing and community service activities. An example of these activities was employees providing financial expertise to a local organization that provides services to LMI households.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the service test in the West Palm Beach-Boca Raton-Delray Beach AA is consistent with the bank's overall performance under the service test in the full-scope area.

State of Idaho

CRA rating for the State of Idaho:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors that support this rating include:

- Adequate lending activity
- Good geographic distribution of loans
- Good borrower distribution of loans
- Significant level of CD loans
- Excellent level of qualified CD investments
- Adequate level of CD services
- Readily accessible service delivery systems to portions of the AA

Description of Bank's Operations in Idaho

The state of Idaho represents KeyBank's 12th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated five AAs within the state of Idaho. Refer to appendix A for a complete description of each AA.

KeyBank had \$1.7 billion of deposits within its AAs, representing 1.6 percent of adjusted deposits. In Idaho, KeyBank ranked third out of 32 depository institutions with a 6.5 percent market share. The top two banks within the AAs in terms of deposits were Wells Fargo Bank with 21.7 percent market share and U.S. Bank with 18 percent market share. KeyBank operated 26 branches and 27 ATMs within these AAs, representing 2.2 percent of the bank's branches and 1.8 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$526.8 million in loans, or 0.6 percent of total bank loan originations and purchases, during the evaluation period.

BOISE CITY MSA

The Boise City MSA AA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Boise MSA. The median housing value of owner-occupied housing units is 5.6 times the MSA annual income of low-income families and 3.5 times that of moderate-income families in the MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Boise City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	91	6.6	29.7	37.4	26.4	0
Population by Geography	633,153	3.5	27.7	44.3	24.5	0
Housing Units by Geography	242,815	4.1	28.1	43.3	24.6	0
Owner-Occupied Units by Geography	155,492	1.5	23.5	46.0	29.0	0
Occupied Rental Units by Geography	73,912	8.7	36.8	38.8	15.7	0
Vacant Units by Geography	13,411	8.9	32.9	36.3	21.8	0
Businesses by Geography	45,616	10.3	25.3	36.5	27.9	0
Farms by Geography	1,980	4.3	25.9	46.2	23.6	0
Family Distribution by Income Level	156,439	19.1	18.8	21.8	40.3	0
Household Distribution by Income Level	229,404	22.8	16.6	19.0	41.6	0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$173,857
			Median Gross Rent			\$842
			Families Below Poverty Level			10%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100 (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the November 2018 Moody's Analytics report, Boise's economy is driven by high tech, manufacturing and retirees. The economy has been buoyed by small technology start-ups drawn to the area due to its below-average business costs compared to other tech hubs in the West. Boise was a top performer with payroll growth twice the U.S. average. The top economic sectors by employment are Professional and Business Services, Government and Education, and Health Services. Top employers are St. Luke's Health System, Micron Technology and Boise State University. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 3.7 percent in 2016, 3.1 percent in 2017 and 2.8 percent in 2018. The unemployment rate in the AA was slightly higher than the overall state of Idaho unemployment rate which averaged 3.8 percent, 3.2 percent and 2.9 percent during the same respective periods.

Home sales increased and prices rose by about 10 percent in 2017-2018, approximately twice the national average. Housing supply was not keeping up with demand; HUD statistics showed that there were about ten potential buyers for every house built in Boise. Boise's house prices were 75 percent below the national average, which may be a deterrent for builders seeking larger profits.

Community Contacts

The analysis considers comments provided by two community contacts pertaining to the Boise City MSA. The contacts represented an affordable housing organization and a Small Business Development Center. Both contacts indicated that economic conditions in the MSA are healthy. There is low

unemployment, high job growth projections and a relatively low cost of living. The population is growing due to migration into Boise from Wash., Ore. and Calif. The area is significantly less expensive with respect to housing than Seattle or Calif. The Boise housing market is in short supply and over-priced; demand for new housing is still outweighing supply. The housing contact mentioned that participation by financial institutions is mainly limited to homebuyer education seminars. Potential opportunities to partner with community organizations exist and include special purpose lending services offering full financing of down payments, home rehabilitation projects and financial coaching and counseling services.

The small business contact indicated that lenders are taking more risk since the economy is good. There has been an increase in SBA lending activity in the area and more equity capital investing. Area banking and credit needs include equipment loans, loans for operational expense and inventory loans. The small business contact mentioned that small businesses are always looking for operating funds. Banks could increase their collaboration with organizations that promote small business economic growth, specifically Boise Startup Week, which is an event filled with activities to help small businesses grow. The housing contact also noted a business need for access to credit to finance the purchase of property to support the growth in agriculture and manufacturing industries.

Scope of Evaluation in Idaho

A full-scope review of the Boise City AA was conducted. KeyBank had 14 branches in the AA, which was 53.8 percent of the bank's total number of branches in the state of Idaho. The bank had an 11.2 percent deposit market share, ranking third among all institutions in the AA. The top competitors included Wells Fargo Bank with 25.3 percent market share and U.S. Bank with 22.5 percent market share. The AA represented 68.9 percent and 75.6 percent of KeyBank's total loans and deposits, respectively, in the state.

The remaining AA's received limited-scope reviews. One of the AAs is the Idaho non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Idaho

LENDING TEST

The bank's performance under the lending test in Idaho is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boise City AA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Boise City MSA	1,078	572	21	2	1,679	57.6%	75.6%
ID Non-MSA	377	242	90	1	710	24.4%	12.3%
Pocatello MSA	60	45	1	0	106	3.6%	4.4%
Idaho Falls MSA	216	103	2	1	322	11.1%	5.9%
Twin Falls MSA	58	27	12	0	97	3.3%	1.8%
Total	1,789	989	132	4	2,914	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Boise City MSA	\$280,280	\$72,793	\$2,906	\$7,807	\$363,066	68.9%	75.6%
ID Non-MSA	\$58,314	\$23,683	\$8,847	\$3,517	\$94,361	17.9%	12.3%
Pocatello MSA	\$5,616	\$5,264	\$10	\$0	\$10,890	2.1%	4.4%
Idaho Falls MSA	\$27,918	\$13,603	\$325	\$2,959	\$44,805	8.5%	5.9%
Twin Falls MSA	\$7,888	\$4,357	\$1,391	\$0	\$13,636	2.6%	1.8%
Total	\$380,016	\$118,980	\$13,479	\$14,283	\$526,758	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked third in deposits with 11.2 percent market share in the AA. In overall HMDA lending, KeyBank ranked 13th with 1.6 percent market share. There was strong competition as reflected by the 361 other lenders and 20 depository institutions in the AA. The top lenders in the AA were Idaho Central Credit Union with 16.4 percent market share, Fairway Independent Mortgage Company with 5.6 percent market share and Wells Fargo Bank with a 5.3 percent market share.

In small loans to businesses, KeyBank ranked 15th out of 82 lenders with a market share of 1.3 percent. The top three lenders were Chase Bank with a market share of 16.9 percent, U.S. Bank with a market share of 12.9 percent and American Express with a market share of 12.9 percent. These top three small business lenders were nationwide lenders with large business credit card portfolios that together captured over 42 percent of the small loans to businesses.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies because these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to table O in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects good distribution.

In 2017-2018, the percentage of loans to borrowers in low-income CTs is near to the proportion of owner-occupied housing in low-income CTs and below the percentage of loans by all lenders in low-

income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing and near to the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses reflects excellent distribution.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income borrowers. The AA's median housing value is 5.6 times the maximum income of low-income borrowers and presents hurdles for mortgage qualification. The percentage of home mortgage loans to moderate-income borrowers exceeds the distribution of moderate-income families and was near to the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is weaker than 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentages of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank has made a relatively high level of CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is good. KeyBank made two CD loans in its AA for a total of \$7.8 million, which represents 5 percent of tier 1 capital allocated to the AA. CD lending performance has a positive impact on the lending test rating. Both loans were responsive to the affordable housing needs in the AA.

An example of a CD loan in the AA includes:

KeyBank provided a \$3.7 million loan for an affordable housing development in Boise City. The project consisted of 40 units of which all 40 are reserved for LMI households. The activity is responsive to an identified need for affordable housing.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank launched the secured credit card; a no-annual fee credit card designed to assist clients, including LMI individuals, build and strengthen their credit history.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Idaho Falls AA is consistent with the bank's overall performance under the lending test in the full-scope area. The bank's performance in the non-MSA AA, Pocatello AA and Twin Falls AA is weaker than the bank's overall performance due to weaker geographic distribution performance and lower community development lending activity.

The performance in the limited scope areas had a neutral impact on the overall lending test conclusion.

Refer to tables O through T in the state of Idaho section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Idaho is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boise City AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boise City MSA	5	\$5,369	3	\$6,524	8	53.3%	\$11,893	53.4%	6	\$3,082
ID Non-MSA	2	\$2,277	0	\$0	2	13.3%	\$2,277	10.2%	1	\$70
Pocatello MSA	1	\$500	0	\$0	1	6.7%	\$500	2.2%	0	\$0
Idaho Falls MSA	2	\$3,930	0	\$0	2	13.3%	\$3,930	17.7%	0	\$0
Twin Falls MSA	1	\$5	1	\$3,654	2	13.3%	\$3,659	16.4%	2	\$73
Total	11	\$12,081	4	\$10,178	15	100%	\$22,259	100%	9	\$3,225

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 7.5 percent of tier 1 capital allocated to the AA. A substantial majority of the bank's CD investments focuses on affordable housing which is an identified credit need in the AA. Additionally, the bank provided a grant totaling \$65 thousand to an organization that primarily provides housing for the homeless within the AA. CD investments involved six LIHTC complex projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and real estate developers.

An example of a CD investment in the AA includes:

KeyBank invested \$3.1 million in an LIHTC affordable housing development located in Emmett. The housing development contains 32 units and all units are restricted to tenants earning no more than 60 percent of the area MFI. This activity is responsive to the identified need for affordable housing in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the non- MSA AA, Idaho Falls AA and Twin Falls AA is consistent with the bank's overall performance under the investment test in the full-scope area. Performance in the Pocatello AA is weaker than the bank's overall performance due to lower volume of CD investments.

Performance differences in the weaker AA had a neutral impact on the overall investment test rating for the state of Idaho.

SERVICE TEST

The bank's performance under the service test in the state of Idaho is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boise City AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boise City MSA	75.6	14	53.8	14.3	42.9	28.6	14.3	3.5	27.7	44.3	24.5
ID Non-MSA	12.3	7	26.9	14.3	57.1	14.3	14.3	13	2.6	69.6	14.8
Pocatello MSA	4.4	2	7.7	0	50	50	0	6.2	14.9	52.3	26.6
Idaho Falls MSA	5.9	2	7.7	0	50	50	0	0	20.9	48.7	30.4
Twin Falls MSA	1.8	1	3.8	0	0	100	0	0	4.7	85.4	9.9

* May not add up to 100 percent due to geographies with unknown tract income level and rounding.

The bank's distribution of branches in low- and moderate-income geographies exceeds the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These

systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 14 ATMs in the AA; all were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boise City MSA	0	0	0	0	0	0
ID Non-MSA	0	0	0	0	0	0
Pocatello MSA	0	-1	0	0	-1	0
Idaho Falls MSA	0	-1	0	-1	0	0
Twin Falls MSA	0	0	0	0	0	0

The bank did not open or close any branches during the review period.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours.

Community Development Services

The bank provides an adequate level of CD services.

Two employees provided CD service activities through board services and/or technical assistance. The employees provided 14 hours of service to organizations that provide community services and housing to homeless individuals.

Conclusion for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the non-MSA AA, Pocatello AA and Idaho Falls AA is consistent with the bank's overall performance under the service test in the full-scope review area. Performance in the Twin Falls AA was weaker than the overall performance due to poor branch distribution.

Performance differences in the weaker limited-scope AA had a neutral impact on the overall service test rating for the state of Idaho.

State of Indiana

CRA rating for the State of Indiana:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Excellent distribution of loans by income level of the borrower
- Good distribution of loans by income level of the geography
- Leader in CD lending
- Significant level of qualified CD investments
- Accessible service delivery systems to portions of the AA
- CD services were at a relatively high level

Description of Bank's Operations in Indiana

The state of Ind. represents KeyBank's ninth largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated five AAs within the state of Ind. Refer to appendix A for a complete description of each AAs.

KeyBank has \$3.4 billion of deposits within its AAs representing 3.1 percent of adjusted deposits. In Ind., KeyBank ranked sixth out of 59 depository institutions with a 5.4 percent market share. The largest bank within the state in terms of deposits was Chase Bank with 19.3 percent market share. KeyBank operated 55 branches and 65 ATMS (62 deposit taking) within the state, representing 4.6 percent of the bank's branches and 4.3 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$724.7 million in loans, or 0.8 percent of total bank loan originations, during the evaluation period.

INDIANAPOLIS-CARMEL-ANDERSON MSA

The Indianapolis-Carmel-Anderson MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Indianapolis AA. The median housing value of owner-occupied housing units is 4.7 times the MSA annual income of low-income families and 3.6 times that of moderate-income families in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	376	17.8	27.4	31.1	23.1	0.5
Population by Geography	1,826,685	11.6	23.1	32.2	32.8	0.3
Housing Units by Geography	779,076	13.3	25.3	31.2	30.0	0.2
Owner-Occupied Units by Geography	448,473	6.7	17.8	36.4	39.1	0.1
Occupied Rental Units by Geography	248,260	20.4	36.2	24.9	18.3	0.2
Vacant Units by Geography	82,343	28.1	33.3	22.1	16.1	0.4
Businesses by Geography	118,477	9.0	19.6	32.4	38.9	0.1
Farms by Geography	3,750	4.2	11.9	49.0	34.7	0.1
Family Distribution by Income Level	450,447	22.3	17.3	19.4	41.0	0
Household Distribution by Income Level	696,733	24	16.4	17.7	41.9	0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$143,304
			Median Gross Rent			\$828
			Families Below Poverty Level			11%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the October 2018 Moody's Analytics report, the Indianapolis MSA was in its ninth year of economic growth. The report noted that the AA offered highly affordable housing, a low cost of doing business, and strong demographics resulting from positive net migration. The three largest employers in the Indianapolis MSA were Indiana University Health, St. Vincent Hospitals & Health Service and Eli Lilly Company. According to the U.S. BLS, the unemployment rate steadily decreased throughout the evaluation period, averaging 4.1 percent in 2016, 3.4 percent in 2017 and 3.3 percent in 2018. Unemployment fell steadily from a high of 8 percent in 2012 to 3.1 percent in 2018. The unemployment rate in the AA was slightly lower than the overall state of Ind. unemployment rate which averaged 4.4 percent, 3.6 percent and 3.5 percent during the same respective periods.

Community Contacts

This analysis considers comments provided by two community contacts serving the Indianapolis MSA. One community contact interviewed serves housing rehabilitation and construction, employment generating activities, real estate development, industrial and small business development, and social services. Another community contact interviewed serves the Morgan County area to connect donors and their charitable giving with evolving community needs through grant making. The contacts noted a growing population and overall job losses over the last 25 years, leaving primarily lower wage jobs. There is insufficient affordable rental and homeownership opportunities in the Indianapolis northern suburbs due to the influx of low-income residents. Gap financing is needed for the development of affordable multifamily housing. Sole-proprietorship entrepreneurs need small loans from \$5 thousand to

\$15 thousand which lenders in the rating area are reluctant to originate. Financial institutions also need to assist area businesses by providing expertise in the areas of financial planning, strategic planning, and marketing.

Scope of Evaluation in Indiana

A full-scope review of the Indianapolis-Carmel-Anderson AA was conducted. KeyBank had 32 branches in the AA, which was 58.2 percent of the bank's total number of branches in the state of Ind. The bank had a 4.2 percent deposit market share, ranking eighth among all institutions in the AA. The top three competitors included Chase Bank with 22 percent market share, PNC Bank with 16.1 percent market share and Fifth Third Bank with 8.3 percent market share. The AA represented 81 percent and 61 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited-scope reviews. One of the AAs is the Ind. non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Indiana

LENDING TEST

The bank's performance under the lending test in Ind. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Indianapolis-Carmel-Anderson	2,426	1,087	33	14	3,560	69.9	61
South Bend-Mishawaka IN/MI	245	178	2	1	426	8.1	18.2
IN Non-MSA Counties	248	120	4	0	372	7.1	6.3
Elkhart-Goshen	336	125	4	0	465	9.2	9.4
Kokomo	180	89	3	0	272	5.5	5.1
Total	3,435	1,599	46	15	5,095	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Indianapolis-Carmel-Anderson	\$371,856	\$97,867	\$2,561	\$114,962	\$587,246	81	61
South Bend-Mishawaka IN/MI	\$31,064	\$19,343	\$18	\$842	\$51,267	7.1	18.2
IN Non-MSA Counties	\$19,961	\$7,939	\$32	\$0	\$27,932	3.9	6.3
Elkhart-Goshen	\$28,029	\$11,454	\$65	\$0	\$39,548	5.5	9.4
Kokomo	\$15,525	\$3,015	\$198	\$0	\$18,738	2.6	5.1
Total	\$466,435	\$139,618	\$2,874	\$115,804	\$724,731	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked eighth in deposits with a 4.2 percent market share in the AA. In overall HMDA lending, KeyBank ranked 24th with a 1.8 percent market share. There was strong competition as reflected by the 274 other lenders in the AA. The top three lenders were GESA Credit Union with 6.9 percent market share, Homestreet Bank with 6.6 percent market share and Umpqua Bank with 4.8 percent market share.

In small loans to businesses, KeyBank ranked 17th with a market share of 0.9 percent. There was strong competition with 51 other lenders. The top three lenders were American Express with 16.2 percent market share, Citibank with 12.7 percent market share and U.S. Bank with 11.6 percent market share. Seven of the top ten small business lenders were nationwide lenders with large business credit card portfolios that together captured over 74 percent of the small loans to businesses.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in home mortgage lending, with a secondary focus on small loans to businesses.

Home Mortgage Loans

Refer to table O in the state of Ind. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution. In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below both the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below both the percentage of owner-occupied housing in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Ind. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is below the percentage of businesses in low-income CTs and exceeds the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is below the percentage of businesses in moderate-income CTs and exceeds the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Ind. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Ind. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and near to the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers exceeds the distribution of moderate-income families and is near to the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is weaker than 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Ind. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is stronger than in 2017-2018.

Small Loans to Farms

Refer to table T in the state of Ind. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent.

KeyBank's level of CD lending has a significantly positive impact on the lending test rating. Within the Indianapolis AA, KeyBank originated 14 loans totaling \$115 million, representing 45 percent of tier 1 capital allocated to the AA. Each of the 14 CD loans benefitted affordable housing organizations or projects.

An example of a CD loan in the AA includes:

KeyBank provided \$15.2 million in two CD loans for an affordable housing development in Indianapolis/Plainfield subject to Section 42 rent and income restrictions. The property is a 220-unit multifamily complex consisting of one, two, three and four-bedroom units. Uncharacteristic of many affordable housing developments, the property includes on-site amenities including a fitness center, media room, playground, outdoor pool and club house.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve the AA's credit needs. An example of an innovation was a loan KeyBank made to an Indianapolis neighborhood organization that supports neighborhood stabilization. The organization provides repair loans to LMI families to prevent deferred maintenance issues. Families who qualify can receive a maximum of \$12,500 in loans to make repairs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Elkhart-Goshen AA and the non-MSA AA is consistent with the full scope AA. In the South Bend-Mishawaka AA and Kokomo AA, the bank's performance is weaker than the bank's overall performance due to weaker demographic distribution.

The performance in the limited-scope areas had a neutral impact on the overall lending test rating.

Refer to tables O through T in the state of Ind. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Ind. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Indianapolis-Carmel-Anderson	14	\$16,539	6	\$17,741	20	65.4	\$34,280	65.6	13	\$14,104
South Bend-Mishawaka IN/MI	3	\$5,434	1	\$2,500	4	15.4	\$7,934	15.3	4	\$2,035
IN Non-MSA Counties	0	\$0	0	\$0	0	0	\$0	0	0	\$0
Elkhart-Goshen	4	\$6,258	2	\$500	6	15.4	\$6,758	12.1	4	\$344
Kokomo	1	\$3,615	0	\$0	1	3.8	\$3,615	7	1	\$175
Total	22	\$31,846	4	\$19,966	26	100	\$51,812	100	22	\$16,658

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investment dollar volumes represent 13.3 percent of tier 1 capital allocated to the AA. The investments and grants reflect excellent responsiveness to credit and community economic development needs in the AA. A substantial majority of the bank's CD investments focus on affordable housing, which is an identified credit need in the AA. The bank's CD investments supported the creation of 1,237 affordable housing units. Additionally, KeyBank provided a grant totaling \$200 thousand to an organization whose primary activity is to provide affordable housing. The grant supports a home repair loan program that helps low- to moderate-income families prevent deferred maintenance.

KeyBank made CD investments in LIHTC projects to support affordable housing. In several instances, KeyBank acted in a leadership role by providing both CD loans and CD investments to the same affordable housing project.

Examples of CD investments in the AA include:

KeyBank provided a \$9.2 million, LIHTC equity investment in a project consisting of 21 new construction buildings, providing 274 units of affordable housing located in Greenwood. In addition to the equity investment, the bank also provided a \$23.3 million construction loan for project development.

KeyBank provided a \$7.1 million LIHTC equity investment in a rehabilitation project consisting of 21 buildings and containing 252 units located in Indianapolis. Each of the 252 units will be reserved for residents at or below 60 percent of the area median income. In addition to the equity investment, KeyBank also provided a \$15 million construction loan for this project.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the South Bend AA, Elkhart AA and Kokomo AA is consistent with the bank's overall performance under the investment test in the full-scope area. Based on limited-scope reviews, the bank's performance under the investment test in the non-MSA AA is weaker than the bank's overall performance under the investment test in the full-scope area.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Ind. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Indianapolis-Carmel-Anderson	61	32	58.2	6.3	25	43.8	25	11.6	23.1	32.2	32.8
South Bend-Mishawaka IN/MI	18.2	6	10.9	16.7	0	66.7	16.7	8.9	17.9	41.8	31.3
IN Non-MSA Co's	6.3	6	10.9	0	50	50	0	0	6.9	78.5	14.6
Elkhart-Goshen	9.4	8	14.5	0	25	62.5	12.5	1	19.3	59.5	20.2
Kokomo	5.1	3	5.5	33.3	0	66.7	0	8.7	16.7	46.6	28
Total	100	55	100	6.3	25	43.8	25	11.6	23.1	32.2	32.8

*May not add up to 100 percent due to geographies with unknown tract income level and rounding.

The bank's distribution of branches in low-income geographies is below, and in moderate-income geographies exceeds, the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 35 ATMs in the AA; all deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Indianapolis-Carmel-Anderson	0	-3	-1	-2	-	-
South Bend-Mishawaka IN/MI	0	0	-	-	-	-
IN Non-MSA Counties	0	-1	-	-	-1	-
Elkhart-Goshen	0	0	-	-	-	-
Kokomo	0	-1	-	-1	-	-

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in low-income geographies and two branches in moderate-income geographies. These branches were closed as part of an operational consolidation plan. KeyBank did not open branches during the evaluation period.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours.

Community Development Services

The bank provides a relatively high level of CD services.

KeyBank employees were actively involved during the evaluation period by providing a total of 237.5 hours of service. Six employees provided 64 hours of financial and management advice to a local community organization that provides services to LMI households. Three employees provided 173 hours of service serving on Boards of Directors for two organizations that provide services to a local community organization that provides services to LMI households and an organization that seeks to provide affordable housing options within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the South Bend AA is weaker than the bank's overall performance under the service test in the full-scope area due to a weaker branch distribution. The bank's performance under the service test in the Elkhart AA and Kokomo AA is consistent with the bank's overall performance under the service test in the full-scope area. The bank's performance under the service test in the non-MSA AA is stronger than the bank's overall performance under the service test in the full-scope area due to stronger branch distribution.

Performance in the limited-scope areas had a neutral impact on the overall service test rating.

State of Maine

CRA rating for the State of Maine:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Excellent distribution of loans by income level of the borrower
- Adequate distribution of loans by geography
- Significant level of CD loans
- Significant level of qualified CD investments
- Accessible service delivery systems
- Adequate level of CD services

Description of Bank's Operations in Maine

The state of Maine represented KeyBank's eleventh largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated three AAs within the state of Maine. Refer to appendix A for a complete description of each AA.

KeyBank had \$2.5 billion of deposits within its AAs, representing 2.3 percent of adjusted deposits. In Maine, KeyBank ranked fourth out of 31 depository institutions with an 8.4 percent market share. The top bank within these AAs in terms of deposits was TD Bank with a 13.1 percent market share. Within its AAs, Key Bank operated 48 branches and 57 ATMs (all deposit-taking), representing 4.1 percent of the bank's total branches and 3.8 percent of the bank's total ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$544.2 million in loans, or 2.7 percent of total bank loan originations and purchases, during the evaluation period.

PORTLAND-LEWISTON-SOUTH PORTLAND CSA

The Portland-Lewiston-South Portland CSA was the only AA selected for a full-scope review. As shown in table A below, the CSA includes the Lewiston-Auburn MSA and the Portland-South Portland MSA.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Portland CSA. The median housing value of owner-occupied housing units is 6.2 times the highest MSA annual income of low-income families and 3.9 times that of moderate-income families in that same MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Portland ME CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	145	5.5	20.7	53.8	17.9	2.1
Population by Geography	628,286	4.2	18.8	58.4	18.6	0
Housing Units by Geography	314,277	4.2	20.5	57.7	17.5	0
Owner-Occupied Units by Geography	179,161	1.2	14.7	63.0	21.2	0
Occupied Rental Units by Geography	80,142	12.2	31.4	45.3	11.1	0
Vacant Units by Geography	54,974	2.7	23.8	58.8	14.7	0
Businesses by Geography	40,812	4.2	23.8	52.2	19.9	0
Farms by Geography	1,474	0.9	13.4	64.5	21.2	0
Family Distribution by Income Level	162,748	21.0	17.5	22.0	39.6	0
Household Distribution by Income Level	259,303	24.2	16.1	17.9	41.8	0
Median Family Income MSA - 30340 Lewiston-Auburn, ME MSA		\$60,363	Median Housing Value			\$232,360
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$74,701	Median Gross Rent			\$897
			Families Below Poverty Level			7.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the September 2018 Moody's Analytics report, the Portland CSA economy rebounded during 2018 from economic weakness in 2017. Healthcare was the strongest industry in the area. Key sectors of the economy based on percentage of total employment included Health Services, Government (federal and local), Manufacturing, Insurance, Grocery Stores and Leisure and Hospitality Services. Worker shortages were driving above-average growth in hourly earnings. Major employers in the CSA included Maine Health, Bath Iron Works Shipyard, L.L. Bean, and Unum Provident and Hannaford Brothers. Maine had the highest median age of residents in the U.S., and the Portland area median age was 43.7. Weaknesses in the economy were a lack of affordable housing, high business costs and an unduly tight labor market. According to the U.S. BLS, the unemployment rate steadily declined throughout the evaluation period, averaging three percent in 2016, 2.7 percent in 2017, and 2.5 percent in 2018. The unemployment rate in the CSA was lower than the overall state of Maine unemployment rate which averaged 3.8 percent, 3.4 percent and 3.2 percent during the same respective periods.

Community Contacts

The analysis considers comments provided by two community contacts serving the Portland CSA. One of the contacts works for a housing authority providing affordable housing and services to low-income families, senior adults and disabled individuals. The other contact represented a community action agency that attempts to meet individual needs of primarily low-income persons. The contacts both noted

a lack of housing stock and affordable housing. Prices are at a level where the working poor, or persons earning at or below the local median income, cannot afford to buy or rent a house. Banks could help by increasing homebuyer education and financial counseling programs. There is also a need for programs where residents can build and improve credit scores. There are opportunities to provide access to English as a second language and job training.

Scope of Evaluation in Maine

A full-scope review of the Portland AA was conducted. KeyBank had 23 branches in the AA, which was 47.9 percent of the bank's total number of branches in the state of Maine. The bank had an 11 percent deposit market share, ranking third among all institutions in the AA. The top competitors included TD Bank with 17 percent market share, Bank of America with 12.9 percent market share, People's United Bank 6.6 percent market share, and Kennebunk Savings Bank a market share of 5.8 percent. The AA represented 49.5 percent and 69.1 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AAs received limited-scope reviews. One of the AAs is the Maine non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Maine

LENDING TEST

The bank's performance under the lending test in Maine is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-Lewiston-South Portland CSA AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Lending levels reflect excellent responsiveness to AA credit needs. Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Portland-Lewiston-South Portland CSA	1,390	811	35	10	2,246	49.1%	69.1%
ME Non-MSA Counties	1,188	544	137	0	1,869	40.9%	25%
Bangor	259	179	21	0	459	10%	5.9%
Total	2,837	1,534	193	10	4,574	100%	100%

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Portland-Lewiston-South Portland CSA	\$242,242	\$70,733	\$1,689	\$36,982	\$351,646	64.6%	69.1%
ME Non-MSA Counties	\$119,747	\$26,737	\$11,487	\$0	\$157,971	29%	25%
Bangor	\$22,803	\$9,630	\$2,158	\$0	\$34,591	6.4%	5.9%
Total	\$384,792	\$107,100	\$15,334	\$36,982	\$544,208	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in the full-scope area only.

KeyBank ranked third in deposits with an 11 percent market share in the AA. In overall HMDA lending, KeyBank ranked 16th with a 1.2 percent market share. There was strong competition as reflected by the 254 other lenders and 30 other depository institutions in the AA. The top three lenders were the Teachers Credit Union with 8.5 percent market share, First Source Bank with 8.1 percent market share and Ruoff Mortgage Company with 7 percent market share.

In small loans to businesses, KeyBank ranked 15th with a market share of 1.4 percent. There was strong competition in the market with 79 other lenders. The top three lenders were Chase Bank with 14.6 percent market share, American Express with 14.2 percent market share, and First Source Bank with 13.9 percent market share. Seven of the top eight small business lenders were nationwide lenders with large business portfolios that together captured over 56.7 percent of the small loans to businesses.

In small loans to farms, KeyBank had a minimal amount of farm lending during the three-year evaluation period totaling 35 loans. There were nine other lenders in the AA. The top two lenders originating most of the farm loans were First Source Bank with 70.3 percent market share and John Deere Financial with 10.8 percent market share. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to table O in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects excellent distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs exceeds the percentage of owner-occupied housing in low-income CTs and is near to the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs exceeds the percentage of owner-occupied housing and near to the percentage of loans by all

lenders in moderate-income CTs. In 2016, the bank's performance is weaker than the performance in 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is below both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is near to the percentage of businesses in moderate-income CTs and exceeds the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent.

In 2017-2018, KeyBank did not originate or purchase any small loans to farms in low-income CTs. This is reasonable when considering only 0.9 percent of the farms in 2017-2018 are in low-income CTs, farm lending by all lenders was only 0.8 percent, and farm lending is not a primary product line for the bank. The percentage of small loans to farms in moderate-income CTs exceeds both the percentage of farms in those CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. Given the median housing value of \$232,360, it would be difficult for a low-income borrower, who would earn less than \$37,351, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers exceeds both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small farms (farms with revenues of \$1 million or less) is below the percentage of small farms in the AA and exceeds the percentage of loans by all lenders to small farms in the AA. In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's total level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made 10 CD loans in its AA for a total of \$37 million, which represents over 17 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. The bank makes significant use of innovative and/or complex CD loans and involving many complex projects where the bank often acts in a leadership role. All 10 CD loans were for the primary purpose of community services to assist LMI individuals.

Examples of CD loans in the AA include:

KeyBank provided eight loans totaling \$25 million to a community services organization that is a nonprofit, community mental health provider, with a network of care, offering services in mental and behavioral health, developmental, and educational services. This organization serves an average of 20,000 children and adults each year, which are primarily LMI individuals. This organization, the oldest child welfare/behavioral health organization in Maine, is focused on providing residential services to children with severe emotional or behavioral problems or learning disabilities.

KeyBank provided two loans totaling \$12 million to another community services organization that is a nationally accredited non-profit organization with a mission to provide behavioral health services and special education for children, adults and families, who are primarily LMI individuals. This organization was started in 1960, providing residential and community-based services for individuals with emotional, behavioral and developmental challenges.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bangor AA and the non-MSA AA is consistent with the bank's overall performance under the lending test in the full-scope area, except for no CD lending activity for either of these two AAs.

The performance in the limited-scope areas had a neutral impact on the overall lending test rating for the state of Maine.

Refer to tables O through T in the state of Maine section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-Lewiston-South Portland AA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The bank's investments demonstrate KeyBank's leadership position in the AA. The current and prior period investments dollar volume represents 9.2 percent of tier 1 capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland-Lewiston-S. Portland CSA	20	\$14,711	6	\$5,200	26	74.3%	\$19,911	64.3%	4	\$2,576
ME Non-MSA Co's	5	\$9,247	1	\$500	6	17.1%	\$9,747	31.5%	2	\$433
Bangor	2	\$1,151	1	\$150	3	8.6%	\$1,301	4.2%	1	\$2
Total	27	\$25,109	5	\$5,500	35	100%	\$30,959	100%	7	\$3,011

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Prior and current investments were predominantly related to affordable housing with LIHTC investments that produced 690 affordable housing units. The remaining investments were related to economic development involving SBICs. The bank also provided donations of \$200 thousand primarily to community service organizations that provide services to LMI individuals.

CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$2.5 million LIHTC investment in an 83-unit affordable housing development serving senior adults 55 or older, whose annual income cannot exceed \$32,550 per person or \$37,200 per couple. Rent is 30 percent of annual adjusted gross income.

KeyBank provided a \$1.6 million LIHTC investment in a 58-unit affordable housing development related to rehabilitating a former school building into housing units set aside for lower income households. Households must earn less than 50 or 60 percent of the area median income (depending on the set-aside option chosen by the property owner) to qualify for these units. Rents in these units are capped at a maximum of 30 percent of the set-aside area median income (adjusted for unit size). HUD Section 8 Housing Choice Vouchers are accepted.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area. The bank's performance under the investment test in the Bangor AA is weaker than the bank's performance in the full-scope area due to a lower level of investments made during the prior evaluation period and no investments during the current evaluation period.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-Lewiston-South Portland AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Portland-Lewiston-South Portland CSA	69.1%	23	47.9%	4.3%	26.1%	52.2%	17.4%	4.2%	18.8%	58.4%	18.6%
ME Non-MSA Counties	25%	20	41.7%	0%	15%	70%	15%	0%	7%	77.1%	15.6%
Bangor	5.9%	5	10.4%	0%	20%	60%	20%	0%	16.4%	56.3%	24.3%
Total	100%	48	100%								

The bank's distribution of branches in low-income geographies and in moderate-income geographies exceeds the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 28 ATMs in the AA, of which 25 were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Portland-Lewiston-South Portland CSA	0	-1	0	-1	0	0
ME Non-MSA Counties	0	-2	0	0	-2	0
Bangor	0	-1	0	-1	0	0

To the extent changes have been made, the bank's opening and closing of branches in the AA has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open any branches and closed one branch in a moderate-income CT in the AA. This closure was due to consolidations of duplicative branches resulting from the merger with First Niagara.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and many of the branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The bank provides an adequate level of CD services.

KeyBank had five employees who were actively involved in CD services during the evaluation period. These CD services included financial education, technical assistance or serving on boards and committees for a total of 284 hours. These five KeyBank employees were either assisting LMI families and individuals with filing their local and federal tax returns, including Earned Income Tax Credit filings, or serving on the board of various CD organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Bangor AA and non-MSA AA is consistent with the bank's overall performance under the service test in the full-scope area.

Performance in the limited-scope areas had a neutral impact on the overall service test rating.

State of Massachusetts

CRA rating for the State of Massachusetts:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Good distribution of loans by income level of the borrower
- Adequate distribution of loans by geography
- Relatively high level of CD loans
- Good level of CD investments
- Accessible service delivery systems
- Few to no CD services

Description of Bank's Operations in Massachusetts

The state of Mass. represented KeyBank's fifteenth largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated only one AA for the state of Massachusetts. Refer to appendix A for a complete description of the AA.

KeyBank had \$1 billion of deposits within the state of Mass. representing one percent of adjusted deposits. In Mass., KeyBank ranks 43rd out of 151 depository institutions with a 0.3 percent market share. The top three depository institutions within Mass. were State Street Bank and Trust Company with 28.3 percent market share, Bank of America with 19.1 percent market share and Citizens Bank with 9.7 percent market share. KeyBank operated eight branches and eight ATMs within the state of Mass. representing 0.7 percent of the bank's branches and 0.5 percent of the bank's ATMs. In comparison to deposits and branching network, the bank originated and purchased approximately \$62 million in loans, or 0.07 percent of total bank loan originations and purchases, during the evaluation period.

SPRINGFIELD MSA

The Springfield MSA was the only AA selected for a full-scope review. This AA accounted for all of the bank's lending and deposits within the state of Mass.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Springfield AA. The median housing value of owner-occupied housing units is 5.1 times the MSA annual income of low-income families and 3.2 times that of moderate-income families in the MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Springfield MA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	103	23.3	20.4	29.1	27.2	0
Population by Geography	468,041	19.3	19.8	29.8	31.1	0
Housing Units by Geography	192,100	18.7	20.3	31.3	29.7	0
Owner-Occupied Units by Geography	109,087	6.4	16.1	34.5	43.0	0
Occupied Rental Units by Geography	67,813	36.7	26.2	26.7	10.4	0
Vacant Units by Geography	15,200	26.7	24.3	28.6	20.4	0
Businesses by Geography	25,449	20.1	20.9	24.7	34.3	0
Farms by Geography	689	3.8	9.9	29.3	57.0	0
Family Distribution by Income Level	115,651	27.2	16.5	17.6	38.7	0
Household Distribution by Income Level	176,900	28.7	14.8	15.7	40.9	0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,381	Median Housing Value			\$189,264
			Median Gross Rent			\$819
			Families Below Poverty Level			13.8%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the September 2018 Moody's Analytics report, Springfield's economy was improving but had below-average employment. The recession hit this area much harder and it had much farther to recover than other national markets. Springfield relies upon healthcare and financial services. The insurance industry is a large part of the local economy with life insurer MassMutual headquartered in Springfield. The area's top employers were University of Massachusetts, Baystate Health and Big Y Supermarkets. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 4.8 percent for 2016, 4.6 percent for 2017 and 4.1 percent for 2018. The unemployment rate in the AA was higher than the overall state of Mass. unemployment rate which averaged 3.9 percent, 3.7 percent and 3.4 percent during the same respective periods.

Median single-family housing prices accelerated but continued to lag behind the state and the nation. Homebuilding had not rebounded since the recession in 2008-2009. Some gains were made but unemployment, job growth and foreclosures affected the area.

Community Contacts

The analysis considers comments provided by several community contacts serving the Springfield MSA AA. Two of the contacts were involved in small business development and affordable housing. Comments regarding Springfield's economy noted that a new MGM casino and the transportation projects, such as the I-91 Viaduct, have contributed to decreasing unemployment and some economic recovery. Nonetheless, there is continued poverty in the area and the infrastructure continues to

deteriorate despite large improvement projects and numerous upgrades and improvements conducted by individual municipalities. Many LMI borrowers struggle to qualify for home mortgages due to past credit delinquencies. Springfield economy has a need for living-wage jobs and self-sufficiency programs for individuals living in LMI communities. Potential opportunities to partner with community organizations exists, such as financial literacy and education initiatives to gradually improve the creditworthiness of LMI borrowers in the area. The contact also noted there is a significant opportunity for institutions to partner with community organizations to invest in or donate to community development.

Scope of Evaluation in Massachusetts

A full-scope review of the Springfield AA was conducted. KeyBank had eight branches in the AA, which was 100 percent of the bank's total number of branches in the state of Mass. The AA represented 0.1 percent and 0.7 percent of the bank's total loans and deposits, respectively, in the state.

There were no AAs that received limited-scope reviews as there were no remaining AAs. The state rating is based on performance in the full-scope AA.

Conclusions With Respect to Performance Tests in Massachusetts

LENDING TEST

The bank's performance under the lending test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield AA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Springfield MSA	198	195	1	1	395	100%	100%

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Springfield MSA	\$25,728	\$15,715	\$50	\$20,518	\$62,011	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked ninth in deposits with a 6.5 percent market share in the AA. In overall HMDA lending, KeyBank ranked sixth with a 4.8 percent market share. There was strong competition as reflected by the 156 other lenders and 20 other depository institutions in the AA. The top lenders in the market were

First Source with 11.9 percent of market share, America Credit Union with 9.3 percent of market share and Adirondack Bank with six percent market share.

KeyBank's did not originate a sufficient amount of loans to small businesses or farms to provide a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of Mass. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below both the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is near to both the percentage of owner-occupied housing and the percentage of loans by all lenders in moderate-income CTs. In 2016, KeyBank's HMDA loan originations and purchases volumes were not sufficient to provide a meaningful analysis.

Small Loans to Businesses

Refer to table Q in the state of Mass. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is well below the percentage of businesses in low-income CTs and below the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is below the percentage of businesses in moderate-income CTs and below the percentage of loans by all lenders in moderate-income CTs. In 2016, KeyBank did not originate a sufficient number of small loans to businesses to conduct a meaningful analysis.

Small Loans to Farms

Refer to table S in the state of Mass. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Mass. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers exceeds the aggregate distribution of loans but it is significantly below the proportion of families. Given the median family housing value of \$189,264, it would be difficult for a low-income borrower, who would earn less than \$33,690, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers exceeds both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is weaker than in 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Mass. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentages of loans by all lender to small businesses in the AA. In 2016, the bank did not make a sufficient number of loans to provide a meaningful analysis.

Small Loans to Farms

Refer to table T in the state of Mass. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of the bank's originations and purchases of small loans to farms by revenue is not evaluated because the volume is not sufficient to provide a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made one CD loan in the AA for a total of \$20.5 million, which represents 16 percent of tier 1 capital allocated to the AA. CD lending performance has a positive impact on the lending test rating. The CD loan is responsive to the identified affordable housing need in the AA.

KeyBank provided a \$20.5 million loan for an affordable housing development in Holyoke. The project consists of 88 units and was a complex project that included demolition, construction and renovation. The project consisted of grants, federal and city funds, LIHTCs and a CD investment of \$16.5 million to fund the entire project. This activity demonstrates the bank's responsiveness to the identified need for affordable housing in the AA and is also discussed under the investment test.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank launched a secured credit card; a no-annual fee credit card. The card was designed to assist clients, including LMI individuals, build and strengthen their credit history.

INVESTMENT TEST

The bank's performance under the investment test in Mass. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA AA is excellent.

The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield MSA	0	0	2	\$16,531	2	100%	\$16,531	100%	1	\$4,956

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investment dollar volumes represent 12.9 percent of tier 1 capital allocated to the AA. All of the bank's CD investments focused on affordable housing, which is an identified credit need in the AA. Additionally, the bank provided one grant totaling \$7,500 to a nonprofit organization serving LMI families. CD investments involve numerous complex projects including LIHTC where the bank often acted in a leadership role with participations from federal, state, and local housing agencies, and real estate developers.

An example of a CD investment in the AA includes a \$16.5 million LIHTC investment for affordable housing development renovation of public housing units located in Holyoke. The project included a combination of demolition, construction and renovation. The project consisted of grants, federal and city funds, LIHTCs and a CD loan of \$20.5 million from KeyBank to fund the entire project. This activity demonstrates the bank's responsiveness to the identified need for affordable housing.

SERVICE TEST

The bank's performance under the service test in Mass. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA AA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Springfield	100%	8	100%	12.5	37.5	12.5	37.5	19.3	19.8	29.8	31.1

The bank's distribution of branches in low-income geographies is below, and in moderate-income geographies exceeds, the percentage of the population living in those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had eight ATMs in the AA; all were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Springfield	0	1	0	-1	0	0

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in the moderate-income area resulting from duplication of branches as a result of the First Niagara acquisition.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 5:00 pm. Four branches are open on Saturday from 9:00 am to noon. One branch is open on Saturday in a moderate- income area.

Community Development Services

The bank provides few, if any, CD services. The bank did not provide any CD services in the Springfield AA.

State of Michigan

CRA rating for the State of Michigan:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Good level of lending activity
- Adequate distribution of loans by borrower income level
- Adequate distribution of loans by geography
- Poor community development lending
- Excellent level of CD investments
- Accessible service delivery systems to portions of the AA
- Poor CD services

Description of Bank's Operations in Michigan

The state of Mich. represents the 13th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated two AAs within the state of Mich. Refer to appendix A for a complete description of each AA.

KeyBank had \$1.5 billion of deposits within its two AAs, representing 1.4 percent of adjusted bank deposits. In Mich., KeyBank ranked 15th out of 122 depository institutions with a 0.7 percent market share. The top three depository institutions within the state in terms of deposits were Chase Bank with 20.2 percent market share, Comerica Bank with 13.9 percent market share and Bank of America with 8.9 percent market share. KeyBank operated 23 branches and 24 ATMs within Mich., representing 1.9 percent of the bank's branches and 1.6 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$382.5 million in loans, or 0.4 percent of total bank loan originations and purchases, during the evaluation period.

DETROIT-WARREN-ANN ARBOR CSA

The Detroit-Warren-Ann Arbor CSA was the only AA selected for a full-scope review. As shown in table A below, the AA includes the Ann Arbor MSA, Monroe MSA, Detroit-Dearborn-Livonia Metropolitan Division (MD), and Warren-Troy-Farmington Hills MD.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Detroit-Warren-Ann Arbor CSA. The median housing value in the CSA was 2.6 times the lowest MSA median income, and 3.1 times moderate-income, and 5.1 times low-income. There was a significant percentage of families below poverty level.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Detroit MI CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	1,149	14.4	22.2	29.1	32.1	2.2
Population by Geography	3,697,591	11.2	19.9	31.7	36.5	0.6
Housing Units by Geography	1,635,872	13.1	21.7	31.1	33.6	0.6
Owner-Occupied Units by Geography	955,398	6.1	15.6	34.5	43.5	0.2
Occupied Rental Units by Geography	470,979	20.7	28.5	28.7	21.1	1.0
Vacant Units by Geography	209,495	27.5	34.0	21.2	16.1	1.3
Businesses by Geography	220,300	7.6	17.0	29.5	44.7	1.1
Farms by Geography	5,471	4.4	11.5	44.9	39.1	0.1
Family Distribution by Income Level	911,183	22.1	15.6	18.1	44.2	0
Household Distribution by Income Level	1,426,377	24.5	14.8	16.3	44.4	0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$136,930
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI MD		\$52,733	Median Gross Rent			\$882
Median Family Income MSA - 33780 Monroe, MI MSA		\$67,811	Families Below Poverty Level			13%
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI MD		\$76,739				
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Ann Arbor MSA

According to the December 2018 Moody's Analytics report, the Ann Arbor economy remained stable and the University of Michigan was the primary driver of the area. Increasing enrollment trends and philanthropic and research funding supported the economy and fed technical jobs in engineering and healthcare. High tech jobs included tech hubs for startup incubators and venture capital entrepreneurs which created demand for a highly trained workforce. The largest employers include the University of Michigan, Trinity Health and General Motors. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 3.7 percent in 2016, 3.5 percent in 2017 and 3.1 percent in 2018. The unemployment rate in the AA was significantly lower than the overall state of Mich. unemployment rate which averaged five percent, 4.6 percent and 4.1 percent during the same respective periods. The housing values and single-family permits were increasing, which indicated a small gain year-over-year.

Monroe MSA

According to the December 2018 Moody's Analytics report, Monroe's economy was improving; job growth matched the Mich. and U.S. averages. Monroe showed gains in construction, education and healthcare jobs, which accounted for 70 percent of the new jobs. Tariffs on metals continued to impact profits and limited capital spending in manufacturing. The largest employers were ProMedica, DTE Entergy and Johnson Controls. The workforce consisted of an underrepresented working age and low educational attainment. The unemployment rate of 4 percent aligned with the state's 4 percent for the fourth quarter of 2018. According to the U.S. BLS, the unemployment rate fluctuated throughout the evaluation period, averaging 4.3 percent in 2016, 4.7 percent in 2017 and 4.2 percent in 2018. The unemployment rate in the AA was lower than the overall state of Mich. unemployment rate, which averaged five percent, 4.6 percent and 4.1 percent during the same respective periods. Median single-family housing pricing was one-third less than the U.S. average in Monroe. Housing inventory was undervalued relative to incomes and rents.

Detroit-Dearborn-Livonia MD

According to the October 2018 Moody's Analytics report, Detroit's economy was improving due to growth in healthcare, construction, transportation and local government. Wages were increasing as more skilled positions accounted for more than three-fifths of the net increase in jobs, with average hourly earnings up more than the previous year. The largest employers included Ford Motor Company, General Motors Corporation, Chrysler Group and Beaumont Health System. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 6.3 percent in 2016, 5.6 percent in 2017 and 5.2 percent in 2018. The unemployment rate in the AA was significantly higher than the overall state of Mich. unemployment rate which averaged five percent, 4.6 percent and 4.1 percent during the same respective periods. Existing home sales were lower than 2017; price gains decreased and did not recover from the pre-recession peak. The falling population, changes to the federal tax code and rising interest rates will continue to impact the housing recovery.

Warren-Troy-Farmington Hills MD

According to the December 2018 Moody's Analytics report, the Warren-Troy-Farmington Hills economy was dependent on the domestic automotive industry. There was some expansion of jobs as General Motors and Alpine Electronics moved their headquarters back to the Warren area and created jobs for engineering and tech firms. The top employers were Beaumont Health System, Chrysler and General Motors. The high-tech jobs represented the highest share of the population of age 25 or older with bachelor's degrees and was the highest in Mich. According to the U.S. BLS, the unemployment rate decreased throughout the evaluation period, averaging 4.7 percent in 2016, 4 percent in 2017 and 3.7 percent in 2018. The unemployment rate in the AA was lower than the overall state of Mich. unemployment rate which averaged 5 percent, 4.6 percent and 4.1 percent during the same respective periods. Housing inventory and values were low compared to the state and U.S.

Community Contacts

The analysis takes into consideration comments provided by two community contacts serving the bank's Detroit-Warren-Ann Arbor CSA. One contact was with a housing agency that provides essential services, diversified programming and community resources to LMI families. The agency noted that the need is for home repair grants or forgivable loans. The city provides a 0 percent home repair program; however, an applicant must meet a minimum credit score. The city neighborhoods continue to be

underinvested for many reasons including appraisals and high loan-to-value ratios. Another contact focuses on providing better neighborhoods by providing housing opportunities for qualified individuals and families through creative and professional services in partnership with the greater community. The organization offers housing at various locations throughout the city. It manages 76 units, with one to four bedrooms. Tenants pay a minimal share in rent and HUD reimburses the Commission 80-90 percent of the rental cost. They are not able to invest in substantial rehabilitation of their units, due to the limited funding received from HUD.

Scope of Evaluation in Michigan

A full-scope evaluation of the Detroit-Warren-Ann Arbor CSA AA was conducted. KeyBank had 18 branches in the AA, which was 78.3 percent of the bank's total number of branches in the state of Mich. The bank had a 0.9 percent market share, ranking 11th among all institutions in the AA. The top three competitors had 57.8 percent of the market and included Chase Bank with 26 percent market share, Comerica Bank with 19.4 percent market share and Bank of America with 12.4 percent market share. The AA represented 82.3 percent and 89.4 percent of the bank's total loans and deposits, respectively, in the state in Mich.

One of the AAs is the Michigan non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The non-MSA AA received a limited-scope review. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Michigan

LENDING TEST

The bank's performance under the lending test in Mich. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit-Warren-Ann Arbor AA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Detroit-Warren	1,133	542	12	10	1,697	82.3%	89.4%
MI Non-MSA	253	107	4	0	364	17.7%	10.6%
Total	1,386	649	16	10	2,061	100%	100%

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Detroit-Warren	\$233,085	\$65,398	\$310	\$51,519	\$350,312	91.6%	89.4%
MI Non-MSA	\$21,500	\$10,659	\$43	\$0	\$32,202	8.4%	10.6%
Total	\$254,585	\$76,057	\$353	\$51,519	\$382,514	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in home mortgage lending, with a secondary focus on small loans to businesses and farms.

Home Mortgage Loans

Refer to table O in the state of Mich. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is poor.

For 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is lower than the percentage of owner-occupied housing in low-income CTs. The proportion of loans in moderate-income geographies is significantly below the aggregate distribution of loans and is significantly below the proportion of owner-occupied housing in those geographies. In 2016, the bank's home mortgage lending is consistent with the combined performance in 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Mich. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is poor.

For 2017-2018, the bank's overall geographic distribution of small loans to businesses is consistent with both the aggregate distribution of loans and the proportion of small businesses in those low-income geographies. The proportion of small business loans in moderate-income geographies is below the percentage of businesses and the aggregate distribution of loans in those geographies. In 2016, the bank's small business lending is consistent with the combined performance in 2017-2018.

Small Loans to Farms

Refer to table S in the state of Mich. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Mich. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is adequate.

The bank's overall home mortgage lending in 2017-2018 to low-income borrowers is slightly below the aggregate distribution of loans, and significantly below the proportion of low-income families. Given the median family housing value of \$136,930, it would be difficult for a low-income borrower, who would earn less than \$25,850, to qualify for a home mortgage loan. The bank's home mortgage lending to moderate-income borrowers is consistent with the aggregate distribution of loans and is consistent with the proportion of moderate-income families. In 2016, the bank's performance is consistent with the combined performance in 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Mich. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

For 2017-2018, the bank's market share of originations and purchases of loans to small businesses with revenues of \$1 million or less exceeds the aggregate small business loan lending data for businesses with revenues of \$1 million or less and is significantly below the total small businesses located in the AA. In 2016, the bank's performance is consistent with the combined performance in 2017-2018.

Small Loans to Farms

Refer to table T in the state of Mich. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank has made a good level of CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the Detroit AA is good. KeyBank made 10 CD loans in the AA for a total of \$51.5 million, which represented 30.2 percent of tier 1 capital allocated to the AA. CD lending

performance has a significant positive impact on the lending test rating. These loans were responsive to the identified affordable housing needs in the AA and were innovative and/or complex.

Examples of CD loans in the AA include:

Partnering with HUD, KeyBank originated a \$14.8 million bridge loan to finance the acquisition of a 144-unit housing facility. The facility consists of one, two- and three-bedroom units designed for those earning 50 to 60 percent of the area median income. This project is located three miles from downtown Ann Arbor.

KeyBank financed a 256-unit apartment complex in Southfield, 20 miles from downtown Detroit. The housing project was financed with an LIHTC program. The units are restricted to residents earning 60 percent or less of the AMI.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank launched a secured credit card; a no-annual fee credit card designed to assist clients, including LMI individuals, build and strengthen their credit history.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the lending test in the non-MSA AA is weaker than the bank's overall lending test performance under the full-scope area due to weaker geographic distribution performance and lower CD lending activity.

The performance in the limited scope AA had a neutral impact on the bank's overall rating for the state of Mich.

Refer to tables O through T in the state of Mich. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Mich. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Detroit-Warren-Ann Arbor AA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Detroit-Warren-Ann Arbor	27	\$23,164	8	\$3,628	35	94.6%	\$26,792	91.7%	24	\$3,867
MI Non-MSA	2	\$2,410	0	\$0	2	5.4%	\$2,410	8.3%	2	\$260
Total	29	\$25,574	8	\$3,628	37	100%	\$29,202	100%	26	\$4,127

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 16 percent of tier 1 capital allocated to the AA. The investments and grants reflect good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers. Current and prior-period investments were LIHTC investments that supported 112 units of affordable housing.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the investment test in the non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area.

SERVICE TEST

The bank's performance under the service test in Mich. is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit-Warren-Ann Arbor AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Detroit-Warren-Ann Arbor	89.4%	18	78.3%	5.6%	22.2%	33.3%	33.3%	11.2	19.9	31.7	36.5
MI Non-MSA	10.6%	5	21.7%	0%	40%	40%	20%	0	17.7	58.4	23.8

KeyBank operated 18 branches in the AA. The branch distribution in low-moderate income geographies is slightly below the percentage of the population in low- and moderate-income CTs in the AA. There was one branch in the low-income geographies and four branches in moderate-income geographies. The branches were full-service locations.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit-Warren-Ann Arbor	0	0	0	0	0	0
MI Non-MSA	0	0	0	0	0	0

The bank did not open or close any branches during the review period.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Generally, the branches were open Monday through Friday, with later hours on Fridays. Fifteen of 18 branches were also open on Saturdays.

Community Development Services

The bank provides a low level of CD services.

One employee provided financial services to one organization since the last evaluation, logging a total of 98 qualified hours within this AA. The CD service assisted LMI families and individuals with completing local and federal tax returns, including Earned Income Tax Credit filings.

Conclusion for Area Receiving Limited-Scope Review

Based on a limited scope review, the bank's performance under the service test in the non-MSA AA is consistent with the bank's overall performance under the service test in the full-scope area.

State of New York

CRA rating for the State of New York:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Excellent distribution of loans by income level of the borrower
- Adequate distribution of loans by geography
- Leader in CD lending
- Significant level of qualified CD investments
- Accessible service delivery systems to portions of the AA
- Adequate CD services

Description of Bank's Operations in New York

The state of N.Y. represented KeyBank's largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated 12 AAs within the state of N.Y. Refer to appendix A for a complete description of each AA.

KeyBank had \$32.7 billion of deposits within its AAs representing 30.3 percent of adjusted deposits. In N.Y., KeyBank ranked ninth out of 182 depository institutions with a 2.3 percent market share. The top three depository institutions in terms of deposits were Chase Bank with 35.1 percent market share, The Bank of New York Mellon with 7.6 percent market share and Goldman Sachs with 7.4 percent market share. Key Bank operated 289 branches and 415 ATMs (379 deposit-taking) within its AAs, representing 24.4 percent of the bank's branches and 25.2 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$4.2 billion in loans, or 1.6 percent of total bank loan originations and purchases, during the evaluation period.

BUFFALO-CHEEKTOWAGA-NIAGARA FALLS MSA

The Buffalo-Cheektowaga-Niagara Falls MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Buffalo-Cheektowaga-Niagara Falls MSA. The median housing value of owner-occupied housing units is 3.7 times the MSA annual income of low-income families and 2.3 times that of moderate-income families in the MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Buffalo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	299	15.4	18.1	39.8	23.4	3.3
Population by Geography	1,135,734	12.7	13.5	40.0	32.5	1.3
Housing Units by Geography	519,952	14.3	15.0	40.6	29.9	0.2
Owner-Occupied Units by Geography	311,183	6.9	11.4	43.8	37.9	0
Occupied Rental Units by Geography	159,470	23.9	19.7	37.1	18.9	0.4
Vacant Units by Geography	49,299	29.7	22.7	32.0	15.1	0.5
Businesses by Geography	63,037	9.1	12.2	37.9	37.2	3.6
Farms by Geography	1,812	3.3	4.0	49.2	42.7	0.9
Family Distribution by Income Level	284,789	22.2	16.6	20.3	40.9	0
Household Distribution by Income Level	470,653	25.9	15.3	16.5	42.3	0
Median Family Income MSA - 15380 Buffalo-Cheektowaga-Niagara Falls, NY MSA		\$67,108	Median Housing Value			\$125,586
			Median Gross Rent			\$726
			Families Below Poverty Level			10.7%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the September 2018 Moody's Analytics report, the Buffalo MSA economy surged in 2017, then fluctuated during 2018. The unemployment rate decreased but remained above the state of N.Y. The area's share of residents age 55 and older ranked near the top among the nation's 100 largest metro areas, making it difficult to fill blue-collar jobs. Major employers in the MSA included Kaleida Health, Catholic Health, M&T Bank, University at Buffalo and Employer Services Corporation. According to the U.S. BLS, the unemployment rate fluctuated slightly throughout the evaluation period, averaging 5.1 percent in 2016, 5.3 percent in 2017, and 4.6 percent in 2018. The unemployment rate in the MSA was slightly higher than the overall state of N.Y. unemployment rate which averaged 4.9 percent, 4.7 percent and 4.1 percent during the same respective periods. Home prices were increasing, due to limited supply and low foreclosures.

Community Contacts

The analysis considers comments provided by several community contacts serving the Buffalo-Cheektowaga-Niagara Falls MSA. The contacts included a rural preservation corporation and a community reinvestment coalition. The contacts noted the need for loans for home repairs and mortgage lending in LMI areas.

Scope of Evaluation in New York

A full-scope review of the Buffalo-Cheektowaga-Niagara Falls MSA AA was conducted. KeyBank had 63 branches in the AA, which was 22.1 percent of the bank's total number of branches in the state of N.Y. The bank had a 16.7 percent deposit market share, ranking second among all institutions in the AA. The top competitors included Manufacturers and Traders Trust Company with 62.8 percent market share, Bank of America with 5.8 percent market share, Citizens Bank with 4.4 percent market share and Northwest Bank with 7.3 percent market share. The AA represented 32.1 percent and 21.7 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited-scope reviews. One of the AAs is the N.Y non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in New York

LENDING TEST

The bank's performance under the lending test in N.Y. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga-Niagara Falls AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Buffalo	6,141	2,877	54	27	9,099	31.5	21.8
NYC MMA	1,282	1,938	18	17	3,255	11.3	11.3
NY Non-MSA	2,154	1,610	96	3	3,863	13.4	9.2
Rochester	1,567	1,545	40	27	3,179	11.0	7.9
Albany CSA	1,644	2,077	27	19	3,767	13.1	35.9
Syracuse	1,126	1,368	52	11	2,557	8.9	7.4
Dutchess-Putnam	541	616	15	3	1,175	4.1	2.2
Utica	447	226	4	6	683	2.4	1.4
Binghamton	136	246	0	4	386	1.3	1.0
Kingston	248	197	11	0	456	1.6	1.0
Watertown	207	128	10	0	345	1.2	0.7
Ithaca	40	37	2	5	83	0.3	0.2
Total	15,533	12,865	329	121	28,848	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Buffalo	\$798,031	\$215,710	\$1,934	\$180,922	\$1,196,597	28.3	21.8
NYC MMA	\$251,283	\$124,033	\$814	\$122,624	\$498,754	11.8	11.3
NY Non-MSA	\$208,377	\$105,471	\$3,070	\$11,850	\$328,768	7.8	9.2
Rochester	\$379,218	\$131,353	\$1,608	\$179,039	\$691,218	16.4	7.9
Albany CSA	\$297,218	\$185,739	\$873	\$350,009	\$833,839	19.7	35.9
Syracuse	\$155,966	\$108,569	\$1,098	\$31,889	\$297,522	7.0	7.4
Dutchess-Putnam	\$83,532	\$27,191	\$317	\$10,650	\$121,690	2.9	2.2
Utica	\$82,923	\$22,037	\$55	\$26,007	\$131,022	3.1	1.4
Binghamton	\$10,089	\$9,042	\$0	\$6,800	\$25,931	0.7	1.0
Kingston	\$30,526	\$11,394	\$600	\$0	\$42,520	1.0	1.0
Watertown	\$19,562	\$13,621	\$363	\$0	\$33,546	0.8	0.7
Ithaca	\$5,512	\$1,694	\$45	\$13,485	\$20,736	0.5	0.2
Total	\$2,322,237	\$955,854	\$10,777	\$933,275	\$4,222,143	100	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked second in deposits with a 16.7 percent market share in the AA. In overall HMDA lending, KeyBank ranked second with an 11.1 percent market share. There was strong competition as reflected by the 253 other lenders and 15 other depository institutions in the AA. The two other lenders in the top three were Manufacturers and Traders Trust Company with 15 percent market share and Citizens Bank with 7.2 percent market share.

In small loans to businesses, KeyBank ranked seventh with a market share of 6.5 percent. There was strong competition in the market with 94 other lenders. The top three lenders were American Express with 20.1 percent market share, Chase Bank with 14.1 percent market share and Bank of America with 8.5 percent market share. Five of the top six small business lenders were nationwide lenders with large business credit card portfolios that together captured over 56 percent of the small loans to businesses.

In small loans to farms, KeyBank ranked 13th with a market share of 1.5 percent. There were 15 other lenders in the AA. The top three lenders were Bank of Castile with 22.1 percent market share, Chase Bank with 14.9 percent market share and John Deere Financial with 14.4 percent market share. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses and small farms.

Home Mortgage Loans

Refer to table O in the state of N.Y. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is well below the percentage of owner-occupied housing in low-income CTs and near to the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing and near to the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is weaker than 2017-2018 due to a lower percentage of home mortgage loans to borrowers in moderate-income CTs. The 2016 performance does not have an impact on the overall rating for this product.

Small Loans to Businesses

Refer to table Q in the state of N.Y. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is below the percentage of businesses in moderate-income CTs and near to the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of N.Y. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate.

In 2017-2018, KeyBank did not originate or purchase any small loans to farms in low-income CTs. This is reasonable when considering only 3.3 percent of the farms in 2017-2018 were located in low-income CTs and farm lending is not a primary product line for the bank. The percentage of small loans to farms in moderate-income CTs is well below the percentage of farms in those CTs and below the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank did not originate or purchase enough small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of N.Y. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families.

Given the median family housing value of \$125,586, it would be difficult for a low-income borrower, who would earn less than \$33,554, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers exceeds both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of N.Y. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of N.Y. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small farms (farms with revenues of \$1 million or less) is below the percentage of small farms in the AA and exceeds the percentage of loans by all lenders to small farms in the AA. In 2016, the bank did not originate or purchase enough small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables included all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made 27 CD loans in its AA for a total of \$180.9 million, which represents over 20.2 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. The bank made significant use of innovative and/or complex CD loans and involved many complex projects where the bank often acted in a leadership role. Just over half of these loans were for the primary purpose of affordable housing. The bank made 16 loans totaling \$110.6 million (55 percent) for affordable housing. Additionally, the bank extended seven loans totaling \$53.1 million for revitalization and stabilization of the AA.

Examples of CD loans in the AA include:

KeyBank provided \$5.4 million in financing for a 30-unit townhouse project in an area identified as blighted. The housing units are designated for families or individuals earning below 50 percent of the area median income. Six units are dedicated to serving individuals with physical, hearing or vision impairments.

KeyBank provided \$25 million in financing to a CD corporation and its partners to redevelop an historic industrial facility, in a moderate-income geography, into a workforce training center. The center is a state-of-the-art high-skills training center that includes classroom space, simulated hands-on training facilities, offices, food service and other amenities. A portion of the facility is also used to provide support to small business startups.

Product Innovation and Flexibility

The bank is a leader in making innovative and/or flexible loans in order to serve AA credit needs. The bank makes significant use of innovative and/or complex CD loans and involving many complex projects where the bank often acts in a leadership role.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Rochester AA, Albany AA, Dutchess-Putnam AA and non-MSA AA is consistent with the bank's overall performance under the lending test in the full-scope area.

Based on limited-scope reviews, the bank's performance under the lending test in the New York City AA, Syracuse AA, Utica AA, Binghamton AA and Ithaca AA is weaker than the full-scope area due to poorer performance in 2016. The bank's performance in the Kingston AA and Watertown AA is weaker due to a lower level of community development lending in these AAs.

The performance in the limited-scope areas had a neutral impact on the overall lending test rating.

Refer to tables O through T in the state of N.Y. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in N.Y. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga-Niagara Falls AA is excellent.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
	Prior Period*		Current Period		Total				Unfunded Commitments**	
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Buffalo	22	56,782	53	26,578	75	31.6	83,360	19.1	14	20,957
NYC MMA	9	10,077	2	16,895	11	4.6	26,972	6.2	8	16,012
NY Non-MSA	8	17,930	2	14,758	10	4.3	32,687	7.5	8	12,709
Rochester	23	32,857	22	53,194	45	19.0	86,051	19.7	16	35,265
Albany CSA	13	69,018	33	62,591	46	19.4	131,609	30.1	15	37,030
Syracuse	18	30,616	6	19,192	24	10.1	49,808	11.4	9	12,642
Dutchess-Putnam	1	90	4	7,560	5	2.1	7,650	1.7	1	2,428
Utica	7	6,508	0	0	7	3.0	6,508	1.5	4	171
Binghamton	2	72	1	5,200	3	1.3	5,272	1.2	2	2,898
Kingston	0	0	0	0	0	0	0	0	0	0
Watertown	5	2,976	1	1,700	6	2.5	4,676	1.1	4	958
Ithaca	3	2,603	0	0	3	1.3	2,603	0.6	1	80
Total	111	229,529	124	207,668	235	100	437,196	100	82	141,150

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 9.3 percent of tier 1 capital allocated to the AA. Two-thirds of the investments were LIHTC investments that produced 988 affordable housing units. The remaining investments were HTCs related to economic development. The significant majority of grants and donations were to community service organizations that provided services to LMI individuals.

CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

Examples of CD investments in the AA include:

KeyBank provided an \$8.3 million LIHTC in a 210-unit affordable housing development serving individuals at or below 60 percent AMI. All residents also receive HUD Section 8 Housing Assistance Payment subsidy.

KeyBank made a \$6.7 million LIHTC investment, in conjunction with the previously mentioned \$5.4 million loan, in a 30-unit townhouse project in an area identified as blighted. The housing units are

designated for families or individuals earning below 50 percent of the area median income. Six units are dedicated to serving individuals with physical, hearing or vision impairments.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in nine of the 11 limited-scope AAs (Rochester, Albany, Syracuse, Dutchess-Putnam, Utica, Binghamton, Watertown, Ithaca, non-MSA) is consistent with the bank's overall performance under the investment test in the full-scope area.

Based on limited-scope reviews, the bank's performance in the NYC MMA AA and Kingston AA is weaker than the performance in the full-scope area due to a lower level of investments made during the current evaluation period.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in N.Y. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga-Niagara Falls AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Buffalo	21.8%	63	21.9	9.4	14.1	42.2	32.8	12.7	13.5	40.0	32.5
NYC MMA	11.3%	32	11.1	0	15.6	18.8	65.6	11.3	17.0	12.7	58.4
NY Non-MSA	9.2%	45	15.6	11.1	22.2	55.6	11.1	1.8	11.0	71.1	14.8
Rochester	7.9%	35	12.2	8.6	28.6	40.0	22.9	9.2	14.4	46.6	28.8
Albany CSA	35.8%	44	15.3	13.6	13.6	52.3	20.5	6.9	17.2	51.8	23.1
Syracuse	7.4%	29	10.0	10.3	20.7	31.0	37.9	9.3	16.7	45.4	27.2
Dutchess-Putnam	2.2%	10	3.5	0	30.0	40.0	30.0	5.1	13.2	57.4	23.5
Utica	1.4%	8	2.8	12.5	12.5	12.5	62.5	14.8	10.7	43.3	28.8
Binghamton	1.0%	6	2.1	0	33.3	50.0	16.7	6.4	12.7	55.0	25.8
Kingston	1.0%	7	2.4	0	0	100	0	2.5	10	56.1	31.4
Watertown	0.7%	7	2.4	0	14.3	85.7	0	0	18.3	74.5	7.1
Ithaca	0.3%	2	0.7	0	0	0	100	0	15.2	54.6	24.4
Total	100%	288	100								

The bank's distribution of branches in low-income geographies is near to, and in moderate-income geographies exceeds, the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay, and mobile banking options. These alternative delivery systems provided product availability and access to banking services to both retail and business customers. The bank's distribution of ATMs was consistent with the distribution of branches. KeyBank had 113 ATMs in the AA, of which 97 were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Buffalo	0	25	-1	-2	-14	-8
NYC MMA	0	15	-1	-1	-4	-9
NY Non-MSA	0	22	-1	-2	-12	-7
Rochester	0	9	-1	-1	-3	-4
Albany CSA	0	25	-2	-4	-14	-5
Syracuse	0	10	-1	-3	-5	-1
Dutchess - Putnam	0	3	0	-2	-1	0
Utica	0	1	0	0	0	-1
Binghamton	0	1	0	0	-1	0
Kingston	0	3	0	-1	-1	-1
Watertown	0	2	0	-1	-1	0
Ithaca	0	0	0	0	0	0

To the extent changes have been made, the bank's opening and closing of branches in the AA has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income geographies and/or to low- and moderate-income individuals. KeyBank did not open any branches and closed one branch in the AA in a low-income CT and two in moderate-income CTs. The closures were due to the consolidation of duplicative branches resulting from the merger with First Niagara.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The bank provides an adequate level of CD services.

Twelve employees were actively involved during the evaluation period by providing financial education and technical assistance to entities, or by serving on boards and committees. Of the 12, five employees provided over 122 hours of assistance to LMI families and individuals with filing their local and federal tax returns, including their Earned Income Tax Credit filings. The remaining seven employees provided over 812 hours of service by providing technical assistance or serving on the boards and committees of various CD organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the NYC MMA, Albany AA, Dutchess-Putnam AA, Utica AA, Binghamton AA and Watertown AA is consistent with the bank's overall performance under the service test in the full-scope area.

Based on limited-scope reviews, the bank's performance in the Rochester AA, Syracuse AA, and non-MSA AA is stronger than the bank's overall performance in the full-scope areas due to better branch distribution in LMI CTs. The bank's performance in the Kingston AA and Ithaca AA is weaker than the bank's performance in the full-scope area due to poorer branch distribution.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

State of Ohio

CRA rating for the State of Ohio:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Excellent distribution of loans by income level of the borrower
- Good distribution of loans by geography
- Leader in CD lending
- Excellent level of qualified CD investments
- Accessible service delivery systems to portions of the AA
- Adequate CD services

Description of Bank's Operations in Ohio

KeyBank is headquartered in Cleveland, where it maintains a significant portion of its employees. Ohio is both the headquarters location and a large deposit base for KeyBank. The state of Ohio represented KeyBank's second largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated six AAs within the state of Ohio. Refer to appendix A for a complete description of each AA.

KeyBank has \$23 billion of deposits within its AAs representing 21.4 percent of adjusted deposits. In Ohio, KeyBank ranked sixth out of 127 depository institutions with an 8.1 percent market share. The top bank within these AAs in terms of deposits was U.S. Bank with a 19.5 percent market share. Key Bank operates 217 branches and 314 ATMs (295 deposit-taking) within its AAs, representing 18.3 percent of the bank's branches and 20.9 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$2.8 billion in loans, or 12.4 percent of total bank loan originations and purchases, during the evaluation period.

CLEVELAND-AKRON-CANTON CSA

The Cleveland-Akron-Canton CSA AA was selected for a full-scope review. The AA combines the Cleveland-Elyria MSA, Akron MSA and Canton-Massillon MSA for analysis.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Cleveland CSA. The median housing value of owner-occupied housing units is 4.1 times the highest MSA annual income of low-income families and 2.6 times that of moderate-income families in the CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Cleveland CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	901	17.4	21.3	36.8	23.0	1.4
Population by Geography	3,171,567	11.2	18.7	39.9	29.8	0.3
Housing Units by Geography	1,448,331	12.7	20.7	39.3	26.8	0.5
Owner-Occupied Units by Geography	853,547	5.9	15.5	43.6	34.8	0.1
Occupied Rental Units by Geography	437,375	21.0	28.4	34.3	15.4	1.0
Vacant Units by Geography	157,409	26.5	27.8	30.1	14.6	1.0
Businesses by Geography	201,079	8.3	14.9	37.5	38.5	0.8
Farms by Geography	5,701	3.4	9.5	50.1	36.9	0.1
Family Distribution by Income Level	806,015	22.0	17.0	20.0	41.0	0
Household Distribution by Income Level	1,290,922	25.4	15.6	17.1	42.0	0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$135,781
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Gross Rent			\$754
Median Family Income MSA – 17460 Cleveland-Elyria, OH MSA		\$65,821	Families Below Poverty Level			11.3%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Cleveland-Elyria MSA

Based on data from the October 2018 Moody's Analytics report, Cleveland-Elyria's economy boomed in 2018. Cleveland was been the best-performing metro area in Ohio in 2018. The area's economy was bolstered by gains in durable goods manufacturing, professional and technical services, transportation and consumer industries. The steel industry is a large contributor to the stronger economy as tariffs resulted in higher prices for goods. The local steel industry is highly dependent on regional auto parts production for its revenues and demand was beginning to weaken. Major employers in the MSA included Cleveland Clinic Foundation, University Hospitals, Progressive Corporation, Giant Eagle and MetroHealth System. According to the U.S. BLS, the Cleveland-Elyria unemployment rate remained relatively stable throughout the evaluation period, with annual averages of 5.4 percent in 2016, 5.6 percent in 2017 and 5.1 percent in 2018. The unemployment rate in the AA was slightly higher than the overall annual averages for the state of Ohio which were 5.2 percent, 4.5 percent and 4.6 percent during the same respective periods.

Akron MSA

Based on data from the October 2018 Moody's Analytics report, the Akron economy strengthened in 2018 and was performing in line with broader Ohio and the U.S. economy. Gains in machinery and transportation equipment output drove industrial production to a multi-year high. Key sectors of the economy based on a percentage of total employment included Education and Health Services, Professional and Business Services, Government and Manufacturing. Major employers in the AA were Summa Health Systems, Akron General Health Systems, Kent State University, Akron Children's Hospital and Goodyear Tire & Rubber Company. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 5.1 percent in 2016, five percent in 2017 and 4.6 percent in 2018. The unemployment rate in the MSA did not vary significantly from the overall state of Ohio averaging 5.2 percent, 4.5 percent and 4.6 percent during the same respective periods.

Canton-Massillon MSA

Based on data from October 2018 Moody's Analytics report, the Canton-Massillon MSA was lagging the rest of Ohio. Mining payrolls were solid, but factories were steadily cutting jobs since early 2015. Construction, logistics and private services were performing well despite population losses. The labor market in the area was tight, and increased competition was leading firms to boost wages to retain workers. Major employers in the MSA were Aultman Hospitals, The Timken Company, Mercy Medical Center, Diebold and Freshmark. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 5.6 percent in 2016, 5.2 percent in 2017 and 4.9 percent in 2018. The unemployment rate in the MSA was slightly higher than the overall state of Ohio averaging 5.2 percent, 4.5 percent and 4.6 percent during the same respective periods.

Community Contacts

The analysis considers comments provided by several community contacts serving the Cleveland CSA. One contact was a community development corporation aimed at fostering and sustaining vibrant neighborhoods. The contact stated that the aging housing stock is attractive to many residents, but comes with higher costs for repairs, improvements and utilities. There is approximately 11 percent of residents 65 years of age or older. As a result, many homes have deferred maintenance. Another contact represented an affordable housing and social service agency focused on strengthening neighborhoods in northeast Ohio. The contact indicated that workforce development, quality education, health and human services and safety are priorities. The area has aging demographics with older housing stock, which increases the need for rehabilitation loans.

Scope of Evaluation in Ohio

A full-scope review of the Cleveland CSA was conducted. KeyBank had 106 branches in the AA, which was 55.8 percent of the bank's total number of branches in the state of Ohio. The bank had a 20.4 percent deposit market share, ranking first among all institutions in the AA. The top competitors included Huntington National Bank with 18.1 percent market share, PNC Bank with 13 percent market share, Citizens Bank with 10.3 percent market share, Chase Bank with 8.1 percent market share and Third Federal Savings and Loan with a market share of 6.7 percent. The AA represented 63.5 percent and 75.3 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited-scope reviews. One of the AAs is the Ohio non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one

AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Ohio

LENDING TEST

The bank's performance under the lending test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland-Akron-Canton AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland CSA	7,022	4,457	47	107	11,633	63.4	80.6
Columbus	1,139	923	3	98	2,163	11.8	5.7
Dayton CSA	567	599	12	10	1,188	6.5	4.8
Toledo	1,301	521	6	5	1,833	10.0	5.1
OH Non-MSA	813	424	31	5	1,273	6.9	3.1
Mansfield	169	98	1	0	268	1.5	0.7
Total	11,011	7,022	100	225	18,358	100	100

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland CSA	\$818,062	\$430,688	\$881	\$169,697	\$1,419,328	51.6	80.6
Columbus	\$596,074	\$92,344	\$35	\$111,757	\$800,209	29.1	5.7
Dayton CSA	\$76,172	\$73,745	\$367	\$24,167	\$174,451	6.3	4.8
Toledo	\$147,828	\$39,367	\$63	\$29,198	\$216,456	7.9	5.1
OH Non-MSA	\$81,617	\$22,186	\$952	\$14,956	\$119,711	4.3	3.1
Mansfield	\$11,280	\$11,312	\$25	\$0	\$22,617	0.8	0.7
Total	\$1,731,033	\$669,642	\$2,323	\$349,775	\$2,752,772	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked first in deposits with a 20.4 percent market share in the AA. In overall HMDA lending, KeyBank ranked fifth with a 3.6 percent market share. There was strong competition as reflected by the 540 other lenders and 45 depository institutions in the AA. The top two lenders were Huntington

National Bank with 14 percent market share and Third Federal Savings and Loan with 5 percent market share.

In small loans to businesses, KeyBank ranked ninth with a market share of 2.5 percent. There was strong competition in the market with 146 other lenders. The top three lenders were American Express with 17.3 percent market share, Chase Bank with 16.8 percent market share and PNC Bank with 11.1 percent market share. Six of the top 10 small business lenders were nationwide lenders with large business credit card portfolios that together captured over 55 percent of the small loans to businesses.

In small loans to farms, KeyBank ranked 13th with a market share of 0.7 percent. There were 17 other lenders in the AA. The top three lenders were Farmers National Bank with 29.1 percent market share, Chase Bank with 20.1 percent market share and Huntington National Bank with 17.1 percent market share. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects good distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is well below the percentage of owner-occupied housing in low-income CTs and exceeds the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing and near to the percentage of loans by all lenders in moderate-income CTs. Some factors that attributed to the bank's difficulty in lending within low-income CTs were the availability of rental units being over twice the number of owner-occupied housing units and it was less expensive to rent than it was to purchase a home. KeyBank is more successful at lending within the low-income CTs than the other lenders in this AA. The performance in the moderate-income CTs is consistent with the low-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is near to both the percentage

of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is stronger than the performance in 2017-2018 due to better distribution in moderate-income CTs. The stronger performance has a positive impact on the conclusion.

Small Loans to Farms

Refer to table S in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is good.

In 2017-2018, KeyBank did not originate or purchase any small loans to farms in low-income CTs. This is reasonable when considering only 3.4 percent of the farms in 2017-2018 were located in low-income CTs and farm lending is not a primary product line for the bank. The percentage of small loans to farms in moderate-income CTs exceeds both the percentage of farms in those CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is well below the distribution of low-income families and near to the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers exceeds the distribution of moderate-income families and near to the percentage of loans by all lenders to moderate-income families. Affordability factors were considered in the rating for home mortgage loans. Given the median family housing value of \$135,781, it would be difficult for a low-income borrower, who would earn less than \$32,910, to qualify for a home mortgage loan. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate

lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to farms of different sizes is excellent.

In 2017-2018, the percentage of KeyBank's loans to small farms (farms with revenues of \$1 million or less) exceeds both the percentage of small farms in the AA and the percentage of loans by all lenders to small farms in the AA. In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made 107 CD loans in its AA for a total of \$169.7 million, which represents over 7.3 percent of tier 1 capital allocated to the AA. CD lending performance has a positive impact on the lending test rating. The bank makes use of innovative and/or complex CD loans and involving many complex projects where the bank often acts in a leadership role. A significant majority of these loans are for the primary purpose of affordable housing. The bank made 96 loans totaling \$150 million (90 percent) for affordable housing. Additionally, the bank extended six loans totaling \$7.1 million for economic development, four CD loans totaling \$12.1 million for revitalization and stabilization of the AA, and one loan for \$500,000 for the primary purpose of community services to assist LMI individuals.

Examples of CD loans in the AA include:

KeyBank make one loan totaling over \$21.6 million to an organization to acquire a 270-unit age-restricted apartment building. The project was based on a section 8 contract and operated under a low-income housing preservation and resident homeownership use agreement. The property owner used the funds to renovate the building and continue to provide affordable housing near the lake.

KeyBank made six loans totaling \$7.4 million to a local nonprofit affordable housing developer and housing service provider that provided capital for weatherization of homes owned by LMI families. This project was a portion of another plan by the same LMI developer. This developer worked directly with community leaders to redevelop 36 blighted properties and create new homes that were listed at selling prices that were affordable for families who met the 60 percent AMI guidelines.

Product Innovation and Flexibility

The bank makes use of innovative and/or complex CD loans and involving many complex projects where the bank often acted in a leadership role.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in all of the limited-scope AAs (Columbus, Dayton, Toledo, Mansfield, non-MSA) is consistent with the bank's overall performance under the lending test in the full-scope area.

Refer to tables O through T in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland-Akron-Canton AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA	63	85,435	66	141,882	129	58.9	227,317	70.0	59	101,200
Columbus	25	10,081	10	28,729	35	16.0	38,810	11.9	27	26,864
Dayton CSA	19	8,734	9	8,317	28	12.8	17,051	5.2	21	9,303
Toledo	12	7,088	5	22,579	17	6.8	29,666	8.9	11	16,346
OH Non-MSA	8	6,081	3	6,700	11	5.0	12,781	3.9	9	7,140
Mansfield	1	64	0	0	1	0.5	64	0	1	2
Total	128	117,483	91	207,407	219	100	324,890	100	128	160,855

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 10.1 percent of tier 1 capital allocated to the AA. A majority of the investments were LIHTC investments that produced 5,366 affordable housing units. The remaining investments were related to economic development and were either NMTCs, HTC, or were investments made to an SBIC. The majority of grants and donations were to community service organizations that provide services to LMI individuals.

CD investments involved several complex tax credit projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

Example of CD investments in the AA include:

KeyBank provided a \$10 million LIHTC investment for a 60-unit affordable housing development. The development targets seniors age 55 and older and consists of 57 one-bedroom units and 3 two-bedroom units. Twelve units are designated for individuals earning 30 percent or below the AMI, twenty-four units are designated for individuals at or below 50 percent of AMI, and 24 units are designated for individuals at or below 60 percent of AMI.

KeyBank provided a \$10.9 million LIHTC investment for the rehabilitation of an existing 8-story, former HUD 236 building. The property is restricted to seniors age 62 or older. There are 148 units total. Thirteen units are restricted to individuals earning 30 percent AMI, seventy-six units are restricted to 50 percent of AMI, and 36 units are restricted to 60 percent AMI. There are 2 units that are designated as non-revenue employee units. Additionally, 21 units, or less than 15 percent, were offered at market rate.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Columbus AA, Dayton AA, Toledo AA and non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area. The bank's performance in the Mansfield AA is weaker than the performance in the full-scope area. The bank made no investments during the current evaluation period.

Performance in the limited-scope areas has a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Ohio is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland-Akron-Canton AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA	80.6	106	55.8	6.6	17.0	35.8	38.7	11.2	18.7	39.9	29.8
Columbus	5.7	25	13.2	8.0	16.0	36.0	40.0	12.0	22.1	29.4	35.7
Dayton CSA	4.8	18	9.5	0	22.2	55.6	22.2	9.9	21.8	40.9	27.4
Toledo	5.2	20	10.5	10.0	25.0	30.0	35.0	13.2	14.6	40.9	30.4
OH Non-MSA	3.1	17	8.9	0	23.5	64.7	11.8	0	15.6	61.6	22.8
Mansfield	0.7	4	2.1	0	25.0	50.0	25.0	3.9	16.8	57.4	21.8

The bank's distribution of branches in low-income geographies is below, and in moderate-income geographies is near to the percentage of the population living within those geographies. KeyBank had alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These alternative delivery services offered additional availability and access to banking services to both low- and moderate-income and small business customers. The distribution of ATMs was consistent with the distribution of branches. KeyBank had 183 ATMs in the AA, of which 165 were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland CSA	0	3	-1	0	-2	0
Columbus	0	1	0	-1	0	0
Dayton CSA	0	2	0	-1	-1	0
Toledo	0	1	0	0	-1	0
OH Non-MSA	0	3	0	-1	-2	0
Mansfield	0	1	0	0	0	-1

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. KeyBank did not open any branches and closed three branches in the AA, one of which is in a low-income geography. These closures were due to consolidations of duplicative branches resulting from the merger with First Niagara.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches that were closed on Saturdays were mainly located in downtown or commercial centers with minimal retail business activity on the weekend.

Community Development Services

The bank provides an adequate level of CD services.

KeyBank employees were actively involved during the evaluation period by providing financial education or technical assistance, serving on boards and committees or providing services related to their area of expertise totaling over 808 service hours.

Twenty-three KeyBank employees provided over 178 hours of assistance to LMI families and individuals with filing their local and federal returns, including their Earned Income Tax Credits.

Sixteen employees provided over 630 hours of service through financial education or technical assistance, servicing on boards and committees, or providing services within their area of expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Columbus AA is consistent with the bank's overall performance under the service test in the full-scope area.

Based on limited-scope reviews, the bank's performance in the Toledo AA and non-MSA AA is stronger than the performance in the full-scope area due to better branch distribution. The bank's performance in the Dayton AA and Mansfield AA is weaker than the bank's performance in the full-scope area due to poorer branch distribution.

Performance in the limited-scope areas has a neutral impact on the overall service test rating.

State of Oregon

CRA rating for the State of Oregon: Outstanding

The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- Good distribution of loans by income level of the borrower
- Adequate distribution of loans among borrowers in different geographies
- Leader in CD lending
- Excellent level of qualified CD investments
- Accessible service delivery systems in the AAs
- The bank provides no CD services in the full-scope AA

Description of Bank's Operations in Oregon

The state of Ore. Represented KeyBank's 18th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated four AAs within the state of Ore. Refer to appendix A for a complete description of each AA.

KeyBank had \$630 million in deposits within its AA's, representing 0.6 percent of the bank's total deposits. In Ore., KeyBank operated 14 branches and had 15 ATMs, representing 1.2 percent of the bank's branches and 1 percent of the bank's ATMs. The top three depository institutions within the state of Ore. were Umpqua Bank with 16.7 percent market share, U.S. Bank with 16 percent market share and Wells Fargo Bank with 11.9 percent market share. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$188.7 million in loans, or 1.2 percent of total reported loan originations and purchases, during the evaluation period.

EUGENE MSA AA

The Eugene MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics and includes housing and business information for the Eugene MSA. The area's median housing value is almost four times the MSA median family income, five times the upper limit for income for moderate-income families and almost eight times the upper limit for income for low-income families. The level of families below the poverty level indicates that housing, in general, may be unaffordable for low-income families.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Eugene OR MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	87	3.4	20.7	51.7	23.0	1.1
Population by Geography	357,060	4.5	20.3	53.5	21.7	0
Housing Units by Geography	157,510	4.6	21.1	54.4	19.9	0
Owner-Occupied Units by Geography	85,785	0.8	16.9	57.2	25.0	0
Occupied Rental Units by Geography	60,450	9.6	26.8	50.2	13.4	0
Vacant Units by Geography	11,275	6.6	22.2	55.2	16.0	0
Businesses by Geography	25,945	5.7	24.1	47.6	22.6	0
Farms by Geography	1,117	1.5	14.1	53.4	31.0	0
Family Distribution by Income Level	86,645	21.4	17.8	20.5	40.3	0
Household Distribution by Income Level	146,235	25.1	15.3	17.0	42.6	0
Median Family Income MSA - 21660 Eugene, OR MSA		\$57,766	Median Housing Value			\$227,588
			Median Gross Rent			\$863
			Families Below Poverty Level			11.8%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

According to the November 2018 Moody's Analytics report, Eugene's economy was improving steadily and more rapidly than the broader state-wide economy. Job openings in high-wage industries resulted in population growth that is higher than the western U.S. and the nation. Demand for labor exceeded supply, resulting in hourly earnings increasing faster than the national average. High-wage tech employees have also driven an increase in service-based industries such as craft breweries. Despite this, Eugene trails Portland in job growth within Oregon. According to the U.S. BLS, the unemployment rate was slightly lower throughout the evaluation period, averaging 5.1 percent in 2016, 4.4 percent in 2017 and 4.4 percent in 2018. The unemployment rate in the MSA was slightly higher than the overall state of Oregon unemployment rate which averaged 4.8 percent, 4.1 percent and 4.1 percent during the same respective periods.

Population growth rose to 1.8 percent, the highest level since 1990. Housing prices were climbing at the highest rate since 2006, with a 9.7 percent year-over-year increase, which was well above the 6.6 percent rise nationally and the 7.1 percent growth state-wide.

Community Contacts

The analysis takes into consideration comments provided by several community organizations servicing the Eugene MSA. The contacts noted that very low-income residents are not benefitting from Eugene's economic recovery. Wayfair created 600 jobs and there are about 13,000 small businesses in the county (many service jobs), but wages are low in those areas. Also, earning a dollar or two more per hour may

not offset the loss of government benefits through assistance. The urban growth boundary creates a lack of land supply for building additional affordable homes. There is a need for second chance checking accounts, low cost or no cost checking accounts, and credit building products such as secured credit cards or individual development account matches. Housing needs include prefabrication, modular and manufactured housing financing, and loans for manufactured home park rehabilitation. Small business lending needs include small dollar loans and loans to cannabis-based businesses, equipment lending, and lines of credit.

Scope of Evaluation in Oregon

A full-scope review of the Eugene MSA AA was conducted. KeyBank had seven branches in the AA, which was 50 percent of the bank's total number of branches in the state of Ore. The bank had a 5.2 percent market share, ranking ninth out of 13 institutions in the AA. The top three competitors had 47.6 percent of the deposit market, and included U.S. Bank with 16.8 percent market share, Umpqua Bank, with 16.6 percent market share and Columbia State Bank with 14.3 percent market share. The AA represented 47 percent and 43.9 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited scope reviews. One of the AAs is the Ore. non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Oregon

LENDING TEST

The bank's performance under the lending test in Oregon is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Eugene AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Eugene	407	183	24	2	616	47.0	43.9
Medford	249	165	4	6	424	32.4	38.7
Grants Pass	64	23	0	0	87	6.6	7.9
OR Non-MSA Counties	124	54	5	0	183	14.0	9.5
Total	844	425	33	8	1,310	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Eugene	\$57,281	\$12,929	\$1,444	\$2,687	\$74,341	39.4	43.9
Medford	\$39,953	\$11,257	\$75	\$32,140	\$83,425	44.2	38.7
Grants Pass	\$6,226	\$1,547	\$0	\$0	\$7,773	4.1	7.9
OR Non-MSA Counties	\$20,993	\$1,979	\$140	\$0	\$23,112	12.3	9.5
Total	\$124,453	\$27,712	\$1,659	\$34,827	\$188,651	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked ninth in deposits with a 5.2 percent market share in the AA. In overall HMDA lending, KeyBank ranked 18th with a 1.8 percent market share. There was strong competition as reflected by the 327 lenders in the AA. The top three lenders were Oregon Community with 7.8 percent market share, Finance Mortgage of America with 6.8 percent market share and Umpqua Bank with 5.6 percent market share.

In small loans to businesses, KeyBank ranked 14th with a market share of 1 percent. There were 66 other lenders in the AA. The top three lenders in the market were U.S. Bank with a market share of 19 percent, Chase Bank with a market share of 14.9 percent, and Citibank with a market share of 11.5 percent.

KeyBank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of Ore. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution in the AA.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below the percentage of owner-occupied housing in low-income CTs and aggregate lending is well below the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is well below the percentage of owner-occupied housing in moderate-income CTs. and aggregate lending is well below the percentage of loans by all lenders in moderate-income CTs.

In 2016, the performance is stronger than 2017-2018. The percentage of home mortgage loans to borrowers in low-income CTs is near to the percentage of owner-occupied housing in low-income CTs and aggregate lending data is near to the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrower in moderate-income CTs is near to percentage of owner-occupied housing in moderate-income CTs and aggregate lending data is near to the percentage of loans by all lenders in moderate-income CTs.

Small Loans to Businesses

Refer to table Q in the state of Ore. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is well below the percentage of businesses in low-income CTs, and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of small loans to businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Ore. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Ore. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is near to the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers is below the distribution of moderate-income families and is near to the percentage of loans by all lenders to low-income families. In 2016, performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Ore. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent.

In 2017-2018, the percentage of KeyBank's loans to small businesses (those businesses with revenues \$1 million or less) is near to the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all

lenders to small businesses in the AA during 2017-2018. In 2016, small loans to businesses is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Ore. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient number of small loans to farms in the state of Ore. to conduct a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

KeyBank made an excellent level of CD loans in the AA. The bank originated two loans totaling \$2.7 million, which represents eight percent of the bank's tier 1 capital allocated to the AA. Both loans benefited organizations that provide economic development services.

An example of CD loans in the AA includes:

The bank originated a \$1.2 million SBA 504 loan to an organization that promotes economic development by supporting permanent job creation, retention and improvement for persons who are currently LMI or residing in LMI geographies.

Product Innovation and Flexibility

The bank makes use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Grants Pass AA is consistent with the bank's overall performance under the lending test in the full-scope area.

Based on limited-scope reviews, the bank's performance under the lending test in the Medford AA is stronger than the bank's overall performance under the lending test in the full-scope area. Performance in the non-MSA AA is weaker than the bank's overall performance under the lending test in the full-scope area. In each case, performance was directly correlated with performance lending within geographies of different incomes.

The bank's performance in the limited-scope review AAs had a neutral impact on the overall lending test rating.

Refer to tables O through T in the state of Ore. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Ore. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Eugene AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Eugene	3	\$10,834	3	\$25	6	40.0%	\$10,859	18.3%	1	\$281
Medford	5	\$18,435	2	\$22,256	7	46.7%	\$40,691	68.4%	1	\$10,400
Grants Pass	1	\$6,300	0	\$0	1	6.7%	\$6,300	10.6%	0	\$0
OR Non-MSA Counties	1	\$1,600	0	\$0	1	6.7%	\$1,600	2.7%	0	\$0
Total	10	\$37,169	5	\$22,281	15	100%	\$59,450	100%	2	\$10,681

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represented 31.2 percent of the bank's tier 1 capital allocated to the AA. The bank made three investments totaling \$25 thousand during the evaluation period. In addition, the bank had three prior period investments totaling \$10.9 million which supported affordable housing projects through LIHTCs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Medford AA, Grants Pass AA and non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area.

SERVICE TEST

The bank's performance under the service test in Ore. is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Eugene AA is adequate.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Eugene	43.9	7	50.0	14.3	28.6	42.9	14.3	4.5	20.3	53.5	21.7
Medford	38.7	5	35.7	20.0	0	80.0	0	1.0	16.6	57.2	25.2
Grants Pass	8.0	1	7.1	0	0	100	0	0	12.8	65.1	22.2
OR Non-MSA Counties	9.5	1	7.1	0	0	0	100	0	0	25.5	74.5

The bank's distribution of branches in low- and moderate-income CTs exceeds the distribution of the population living in those geographies. KeyBank had alternative delivery systems, including debit cards and ATMs, mobile banking, online banking and electronic bill-pay. These alternative systems provided additional availability and access to banking services to both low- and moderate-income and small business customers. The bank's distribution of ATMs was consistent with the distribution of its branches. KeyBank had seven ATMs in the full-scope AA.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Eugene	0	0	0	0	0	0
Portland-Vancouver-Salem CSA (OR Portion)	0	0	0	0	0	0
Medford	0	0	0	0	0	0
Grants Pass	0	0	0	0	0	0
OR Non-MSA Counties	0	0	0	0	0	0

KeyBank did not open or close any branches during the evaluation period within the Eugene AA.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Branches were generally open Monday through Friday with all branches in the AA having extended hours on Fridays. One branch in a moderate-income CT and one branch in an upper-income CT were open on Saturdays. All services were available at each branch.

Community Development Services

The bank provides few, if any, CD services.

KeyBank provided CD services to one organization in the AA. One employee provided 150 hours of CD services by serving on the board of directors and providing technical expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Medford AA, Grants Pass AA and non-MSA AA is weaker than the bank's overall performance under the service test in the full-scope area. This was due to weaker distributions of branches within LMI geographies.

Performance in the limited scope AAs had a neutral impact on the overall service test rating.

State of Pennsylvania

CRA rating for the State of Pennsylvania:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity
- The bank exhibits an excellent distribution of loans among level of the borrower
- The bank exhibits a good distribution of loans among borrowers in different geographies
- Leader in CD lending
- Good level of qualified CD investments
- Accessible service delivery systems to portions of the AAs
- Adequate level of CD services

Description of Bank's Operations in Pennsylvania

The state of Pa. represents KeyBank's fourth largest rated area out of 19 rating areas in terms of deposits. KeyBank delineated eight AAs within the state of Pa. Refer to appendix A for a complete description of each AA.

KeyBank had \$7 billion of deposits within the state of Pa. representing 6.6 percent of adjusted deposits. In Pa., the bank ranked 13th out of 162 institutions with a 1.8 percent market share. The top three depository institutions within the state were PNC Bank with 23 percent market share, Wells Fargo Bank with 9 percent market share and Citizens Bank of PA with 7.8 percent market share. KeyBank had 112 branches and 112 ATMs in the state, which represented 9.5 percent of the bank's branches and 7.5 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$1.1 billion in loans, or 5.9 percent of total bank loan originations and purchases, during the evaluation period.

PITTSBURGH MSA

The Pittsburgh MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Pittsburgh MSA. The median housing value in the MSA is two times the median income, indicating that housing is generally affordable for LMI families. However, real estate taxes are relatively high in much of the Pittsburgh MSA which reduces the affordability for LMI households. As a result, renting is a more cost-effective alternative for many LMI households. Furthermore, there is a limited number of owner-occupied units compared to rental units in LMI geographies.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Pittsburgh PA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	641	9.2	23.1	42.7	22.6	2.3
Population by Geography	2,121,162	5.4	19.5	46.1	28.4	0.6
Housing Units by Geography	993,981	6.3	21.3	46.4	25.8	0.1
Owner-Occupied Units by Geography	618,562	2.9	16.9	49.2	31.0	0
Occupied Rental Units by Geography	274,357	11.6	28.1	41.9	18.1	0.4
Vacant Units by Geography	101,062	13.0	30.2	41.7	14.8	0.3
Businesses by Geography	148,258	5.2	14.9	41.1	37.9	0.9
Farms by Geography	3,495	2.1	13.0	55.7	29.1	0.1
Family Distribution by Income Level	546,799	21.0	17.1	20.4	41.6	0
Household Distribution by Income Level	892,919	25.1	15.3	16.9	42.7	0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$139,751
			Median Gross Rent			\$762
			Families Below Poverty Level			8.5%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

According to the September 2019 Moody's analytics report, Pittsburgh's economy was slowing. Net hiring declined to nearly zero after two years of one percent growth. While there have been gains in professional and business services and the public sector, these gains are offset by employment losses in healthcare and education, leisure and hospitality and construction. Retail job losses were also a concern as payrolls were reduced in response to more online shopping. These job losses were steeper than the national trend, due in part to continued population losses and an aging population. Growth in hourly earnings ceased due to a weaker job mix and reductions in middle-wage industries. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 5.6 percent in 2016, 5 percent in 2017 and 4.2 percent in 2018. The unemployment rate in the MSA was slightly higher than the overall state of Pa. unemployment rate which averaged 5.4 percent, 4.9 percent and 4.2 percent during the same respective periods.

Community Contacts

This analysis takes into consideration comments by two community contacts serving the bank's Pittsburgh MSA. The contacts represented a local coalition of community development groups and a CDFI. The contacts noted that the aging population was a concern. Allegheny County has the second highest population of seniors in the country. The area's low cost of living and access to highly educated college graduates due to the large number of colleges and universities in the region has prompted a rise in wages. The increases in higher wage jobs has resulted in rising housing costs and older residents may be left behind in the boom due to lower educational attainment levels. Programs to support

rehabilitation of the aging housing stock (60 percent of homes were built prior to 1940) and the elderly population remain a consistent concern. Single family home price appreciation has reached its highest point since the early 2000s. Affordable housing and funding for home improvements will remain the regions primary credit needs and that there is a lack of innovative products in the area.

Scope of Evaluation in Pennsylvania

A full-scope review of the Pittsburgh MSA AA was conducted. KeyBank had 54 branches in the AA, which was 47.3 percent of the bank's total number of branches in the state of Pa. The bank had a 3 percent market share, ranking eighth among all institutions in the AA. The top competitors were PNC Bank with 44.3 percent market share, Bank of NY Mellon with 21.4 percent market share and Citizens Bank of Pa. with 6.8 percent market share. The AA represented 47.1 percent and 57.9 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AA's received limited scope reviews. One of the AAs is the Pa. non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Pennsylvania

LENDING TEST

The bank's performance under the lending test in Pa. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs when considering the bank's market share, competition and availability of owner-occupied units.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Pittsburgh MSA	1,583	2,087	23	12	3,705	47.2	57.9
Montgomery-Bucks-Chester Counties AA	1,117	1,227	16	5	2,365	30.1	29.7
Philadelphia	70	200	0	3	273	3.5	0.8
Allentown-Bethlehem-Easton (PA-NJ) MMA	295	281	2	2	580	7.4	6.6
Reading	112	94	0	2	208	2.7	0.5
Erie	157	324	6	2	489	6.2	2.5
PA Non-MSA Counties	75	102	1	0	178	2.3	1.3
East Stroudsburg	31	15	1	0	47	0.6	0.7
Total	3,440	4,330	49	26	7,845	100	100

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Pittsburgh MSA	\$173,031	\$155,581	\$841	\$86,006	\$415,459	38.3	57.9
Montgomery-Bucks-Chester Counties	\$203,548	\$88,547	\$351	\$18,447	\$310,893	28.6	29.7
Philadelphia	\$10,190	\$12,398	\$0	\$13,499	\$36,087	3.3	0.8
Allentown-Bethlehem-Easton (PA-NJ) MMA	\$27,137	\$13,678	\$50	\$49,119	\$89,984	8.3	6.6
Reading	\$81,905	\$2,997	\$0	\$72,075	\$156,977	14.5	0.5
Erie	\$22,091	\$26,768	\$163	\$12,396	\$61,418	5.7	2.5
PA Non-MSA Counties	\$5,465	\$6,185	\$50	\$0	\$11,700	1.1	1.3
East Stroudsburg	\$2,561	\$1,054	\$10	\$0	\$3,625	0.3	0.7
Total	\$525,928	\$307,208	\$1,465	\$251,542	\$1,086,143	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked eighth in deposits with a 3 percent market share in the AA. In overall HMDA lending, KeyBank ranked 12th with a 1.8 percent market share. There was strong competition as reflected by the 563 lenders operating in the AA. The three top lenders in the AA were PNC Bank with 10.5 percent market share, Wells Fargo Bank with 6.8 percent market share and Dollar Bank with 6.6 percent market share.

In small loans to businesses, KeyBank ranked seventh with a market share of 2.6 percent. There was significant competition as reflected by the 130 small business lenders in the AA. The top three lenders in the AA were PNC Bank with 21.6 percent market share, American Express with 16.7 percent market share and Chase Bank with 9.9 percent market share.

Competition was less significant in small loans to farms, where KeyBank ranked 15th out of 22 lenders, with a 1.6 percent market share. The top three lenders to small farms were John Deere Financial with a market share of 18.2 percent, Chase Bank with a market share of 13.9 percent and Wells Fargo Bank with a market share of 12.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of Pa. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Equal emphasis was placed on the bank's performance in 2016 and 2017-2018.

The geographic distribution of home mortgage loans reflects good distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is below the percentage of owner-occupied housing in low-income CTs and exceeds the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is below the percentage of owner-occupied housing in moderate-income CTs and exceeds the

percentage of loans by all lenders in moderate-income CTs. Home mortgage lending was negatively impacted by low owner-occupied unit rates in the AA, which limited the number of home purchase opportunities for borrowers in LMI geographies.

In 2016, the performance in low-income and moderate-income CTs is stronger. This stronger performance has a positive impact on the rating for this product.

Small Loans to Businesses

Refer to table Q in the state of Pa. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the bank made no small loans to businesses in low-income CTs. The percentage of small loans to businesses in moderate-income CTs is equal to the percentage of businesses in moderate-income CTs and exceeds the percentage of loans by all lenders in moderate-income CTs. In 2016, performance among low-income CTs is weaker than, and the moderate-income CTs is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Pa. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs is below the percentage of farms in low-income CTs and exceeds the percentage of loans by all lenders in low-income CTs. The percentage of small loans to farms in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Pa. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is excellent.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers exceeds both the distribution of

moderate-income families and the percentage of loans by all lenders to moderate-income families. Home mortgage lending was affected by higher real estate taxes which impacted the affordability of home ownership for LMI borrowers within the AA. In 2016, performance among low-income borrowers is weaker than, and the moderate-income families was consistent with, 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Pa. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is adequate.

In 2017-2018, the percentage of KeyBank's loans to small businesses (those businesses with revenues of \$1 million or less) is below the percentages of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses is near to the percentage of loans by all lenders to small businesses in the AA during 2017-2018.

In 2016, the percentage of KeyBank's loans to small businesses is well below the percentages of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA during 2016.

Small Loans to Farms

Refer to table T in the state of Pa. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small farms (those farms with revenues of \$1 million or less) is below the percentages of small farms in the AA. When compared to aggregate lending data, the bank's percentage of loans to small farms exceeds to the percentage of loans by all lenders to small businesses in the AA during 2017-2018.

In 2016, KeyBank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. The bank originated 12 loans totaling \$86 million, which represents 17 percent of the bank's tier 1 capital allocated to the AA. Seven loans totaling \$33.4 million benefited six affordable housing organizations. One loan totaling \$500 thousand benefited one

community service organization. Four loans totaling \$52.1 million benefited three organizations working to revitalize areas within the MSA or support economic development.

Examples of CD loans in the AA include:

The bank originated a \$48 million loan to finance the renovations of a historic building into a hotel. This loan will provide an anchor business in an LMI CT, employ LMI residents by retaining businesses, and attract a major new employer that will create long-term job opportunities, including for LMI residents.

The bank originated a \$5.2 million loan to support the revitalization and replacement of existing public housing. This project includes 47 affordable housing units and 18 market rate units. The affordable housing units are subsidized by the Housing Authority of the City of Pittsburgh. Five units are set aside for households with incomes of 20 percent or less than the AMI while 28 units are set aside for housing below 50 percent of the AMI. The remaining 14 units are set aside for households at or below 60 percent of the AMI.

The bank originated a \$5.4 million loan to finance an affordable housing project with 104 units. This property includes 88 one-bedroom units and 16 two-bedroom units. Rents are based on income and calculated exclusively to 30 percent of the household's combined adjusted income.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance in the Montgomery-Bucks-Chester County AA and non-MSA AA is consistent with performance in the full-scope AA.

The bank's performance in the remaining five limited-scope AAs (Philadelphia, Allentown-Bethlehem-Easton (PA-NJ MMSA), Reading, Erie, East Stroudsburg) is weaker than performance in the full-scope AA due to weaker geographic distribution of loans and weaker borrower distribution of loans.

Performance in the limited-scope AAs had a neutral impact on the overall lending test rating.

Refer to tables O through T in the state of the Pa. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Pa. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh MSA	7	22,938	8	5,050	15	57.7	27,988	71.3	5	3,142
Montgomery-Bucks-Chestr	1	1,606	2	1,149	3	11.5	2,755	7.0	3	2,792
Philadelphia	1	3,444	1	3,000	2	7.7	6,444	16.4	2	2,906
PA-NJ MMSA	1	1,842	2	75	3	11.5	1,917	4.9	0	0
Reading	0	0	0	0	0	0	0	0	0	0
Erie	0	0	3	150	3	11.5	150	0.4	0	0
PA Non-MSA Counties	0	0	0	0	0	0	0	0	0	0
East Stroudsburg	0	0	0	0	0	0	0	0	0	0
Total	10	29,830	16	9,424	26	100	39,254	100	10	8,840

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 5.2 percent of the bank's tier 1 capital allocated to the AA. The bank made eight investments totaling \$5 million during the evaluation period. CD investments included purchases of a LIHTC fund that supports affordable housing. In addition, the bank had seven prior period investments totaling \$22.9 million. Of this, \$253 thousand supported economic development in the region, while the remaining \$22.7 million supported affordable housing through various LIHTC investments.

In addition to its investments, the bank made seven grants and donations totaling \$1.1 million that supported five organizations that support LMI geographies, families, and individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance under the investment test in the Philadelphia AA and non-MSA AA is stronger than the bank's overall performance under the investment test in the full-scope area due to a higher level of CD investments. The bank's performance under the investment test in the remaining five AAs (PA-NJ, Montgomery-Bucks-Chester, Reading, Erie, East Stroudsburg) is weaker than the bank's overall performance under the investment test in the full-scope area due to a lower level of CD investments.

Performance in the limited-scope AAs had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Pa. is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsburgh, PA	57.91	53	47.32	11.3	17.0	37.7	34.0	5.4	19.5	46.1	28.4
Allentown	6.62	12	10.71	8.3	0	66.7	25.0	8.74	20.4	41.6	29.3
East Stroudsburg	0.64	1	0.89	0	0	100	0	0	11.3	83.4	5.3
Erie	2.52	5	4.46	20.0	20.0	60.0	0	9.6	12.9	46.3	30.4
Montgomery Co.	29.69	37	33.04	2.7	21.6	43.2	32.4	3.5	19.0	47.9	29.3
Philadelphia	0.80	1	0.89	0	0	0	100	13.8	36.2	25.5	23.9
Reading	0.48	1	0.89	0	0	0	100	15.5	5.5	55.7	23.3
PA Non-MSA	1.34	2	1.79	0	0	100.	0	0	0	93.31	6.7

The bank's distribution of branches in low-income CTs exceeds the distribution of the population living in these areas. The branches in moderate-income CTs is near to the distribution of the population living in these areas. KeyBank had alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. The bank's distribution of ATMs was consistent with the distribution of branches. KeyBank had 54 ATMs in the AA.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Pittsburgh MSA	0	-2	-1	-1	0	0
Montgomery-Bucks-Chester Counties	0	-5	0	-2	-2	-1
Philadelphia	0	0	0	0	0	0
Allentown-Bethlehem-Easton (PA-NJ) MMA	0	-1	0	0	-1	0
Reading	0	-1	0	0	-1	0
Erie	0	0	0	0	0	0
PA Non-MSA Co's	0	-1	0	0	-1	0
East Stroudsburg	0	0	0	0	0	0

To the extent changes have been made, the bank's opening and closing of branches in the AA has generally not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. KeyBank closed two branches in the AA during the evaluation period, one of which was located in a low-income CT and one of which was located in a moderate-income CT. These closures occurred due to nationwide branch consolidation. Despite the closures, KeyBank maintained an excellent distribution of branches in low-income geographies and a good distribution of branches in moderate-income geographies.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Branches were generally open from Monday through Friday with a majority of the branches being open late on Fridays. A majority of the branches had Saturday hours. Branches in low- and moderate-income CTs did not close early or fail to open on Saturday at a rate higher than those in middle- and upper-income CTs.

Community Development Services

The bank provides an adequate level of CD services.

KeyBank provided CD services to two organization that provide affordable housing options to the community. Two employees devoted approximately 96.8 hours serving on the board of directors.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Montgomery-Bucks-Chester County AA is consistent with the bank's overall performance under the service test in the full-scope area.

Based on limited-scope reviews, the bank's performance in the Philadelphia AA, Allentown-Bethlehem-Easton (PA-NJ) MMA, Reading AA, East Stroudsburg AA and non-MSA AA is weaker than the bank's

overall performance under the service test in the full-scope area. Performance under the service test in the Erie AA is stronger than the bank's overall performance under the service test in the full-scope area.

The performance in the limited-scope areas had a neutral impact on the overall services test rating.

State of Utah

CRA rating for the State of Utah:	Outstanding
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending activity
- Adequate geographic distribution of loans
- Adequate borrower distribution of loans
- KeyBank is a leader in providing CD loans, which has a significant positive impact on the lending test
- KeyBank's use of flexible products has a positive impact on the Lending
- Excellent level of CD investments
- Accessible retail delivery systems to all portions of the AA
- Adequate level of CD services

Description of Bank's Operations in Utah

The state of Utah represented, KeyBank's 7th largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated three AAs within the state of Utah. Refer to appendix A for a complete description of each AA.

KeyBank had \$4.3 billion of deposits within the state of Utah representing 3.9 percent of adjusted deposits. The Salt Lake City CSA accounted for the largest portion of the lending (92.1 percent) and deposits (97.6 percent) among KeyBank's AAs in Utah. KeyBank operated 31 branches and 39 ATMs, representing 2.6 percent of the bank's branches and 2.6 percent of the bank's ATMs. The bank originated and purchased approximately \$958.1 million in loans, or 4.9 percent of total reported loan originations and purchases, during the evaluation period.

SALT LAKE CITY-PROVO-OREM CSA

The Salt Lake City-Provo-Orem CSA was the only AA selected for a full-scope review. As shown in table A below, the CSA includes the Ogden-Clearfield MSA, Provo-Orem MSA and the Salt Lake City MSA.

Demographic Data

The following table provides a summary of the demographics that includes housing and business information for the Salt Lake City CSA. The area's median housing value in the CSA is 3.2 times the highest MSA median income, but four times moderate-, and 6.4 times low-income, indicating a limited proportion of owner-occupied units are affordable to LMI individuals. Median rents and the high percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Salt Lake CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	466	4.9	21.5	43.1	29.4	1.1
Population by Geography	2,304,855	3.8	20.2	46.1	29.5	0.4
Housing Units by Geography	755,744	3.8	22.5	45.6	27.7	0.4
Owner-Occupied Units by Geography	492,273	1.3	16.2	48.6	33.6	0.2
Occupied Rental Units by Geography	221,165	9.4	35.6	39.8	14.6	0.6
Vacant Units by Geography	42,306	4.8	27.5	40.1	27.4	0.1
Businesses by Geography	182,255	4.0	18.5	42.5	34.6	0.5
Farms by Geography	3,700	2.1	15.4	50.0	32.4	0.2
Family Distribution by Income Level	536,232	19.1	18.2	22.8	39.9	0
Household Distribution by Income Level	713,438	21.7	16.9	21.2	40.2	0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$71,742	Median Housing Value			\$229,244
Median Family Income MSA - 39340 Provo-Orem, UT MSA		\$67,248	Median Gross Rent			\$933
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Families Below Poverty Level			8.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Salt Lake City MSA

According to the November 2018 Moody's Analytics report, Salt Lake City's economy was one of the strongest in the West. Worker shortages were slowing the pace of hiring but the job growth rate was above national and regional averages. Salt Lake City had a business-friendly environment, low-cost structure and favorable demographics. The largest employers in the area were the University of Utah, Intermountain Health Care and Wal-Mart Stores. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 3.2 percent for 2016, 3.1 percent for 2017 and three percent for 2018. The unemployment rate in the MSA was slightly below the overall state of Utah unemployment rate which averaged 3.4 percent, 3.3 percent and three percent. The outlook for the housing market was favorable due to a strong labor market and robust population gains. Prices were climbing faster than nationally since mid-2015 and were up almost 10 percent over 2017.

Ogden-Clearfield MSA

According to the November 2018 Moody's Analytics report, Ogden's economy showed worker shortages and an above average growth in wages. While construction payrolls declined dramatically, manufacturing added 1,100 jobs in the second half of 2018. Hill Air Force base was the largest single-site employer in Utah, followed by the, Department of the Treasury and McKay-Dee Hospital Center.

According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 3.4 percent for 2016, 3.3 percent for 2017 and 3.1 percent for 2018. The unemployment rate in the MSA was exactly the same as the overall state of Utah unemployment rate which averaged 3.4 percent, 3.3 percent and three percent. Worker shortages were constraining residential and commercial construction in Ogden. Indicative of heavy demand, existing-home prices were appreciating at a double-digit pace, twice the national rate.

Provo-Orem MSA

According to the November 2018 Moody's Analytics report, Provo's economy was strong, supported by a strong labor market. Consistent with an aging expansion, Provo had more job openings than workers to fill them, and as a result the jobless rate held steady at less than 2.9 percent. The tight job market was sustaining above-average wage growth as firms competed to attract and retain quality labor. The metro area was one of the top tech hubs in the West, with a diverse cluster ranging from aerospace to software publishing. The largest employers in the MSA were the Brigham Young University, Utah Valley Regional Medical Center and Utah Valley University. According to the U.S. BLS, the unemployment rate decreased slightly throughout the evaluation period, averaging 3.1 percent for 2016, 2.9 percent for 2017 and 2.8 percent for 2018. The unemployment rate in the MSA was slightly below the overall state of Utah unemployment rate which averaged 3.4 percent, 3.3 percent and 3 percent. As with the Ogden-Clearfield MSA, high demand was causing existing home prices to appreciate at a double-digit pace.

Community Contacts

The analysis takes into consideration comments provided by two community contacts that serve the bank's CSA. Comments noted that Salt Lake County has a strong economy with low unemployment, but wages are lagging to keep up with the cost of living. There is a housing shortage in Salt Lake County, specifically in multifamily housing and/or affordable housing. Small- and start-up businesses are having a hard time obtaining loans. Financial institutions have opportunities to become more involved in helping the local community by allowing businesses to obtain loans.

Scope of Evaluation in Utah

A full-scope review of the Salt Lake City-Provo-Orem CSA AA was conducted. KeyBank had 28 branches in the AA, which was 90.3 percent of the bank's total number of branches in the state of Utah. The bank had a 0.8 percent market share, ranking 14th among all institutions in the AA. The top three depository institutions in terms of deposit market share were Morgan Stanley Bank with 22.9 percent, Ally Bank with 19.4 percent and American Express with 13.1 percent. The AA represented 92.6 percent and 97.6 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AAs received limited-scope reviews. One of the AAs is the Utah non-Metro AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Utah

LENDING TEST

The bank's performance under the lending test in Utah is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City-Provo-Orem AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City CSA	1,791	1,281	19	24	3,115	92.6	97.6
Logan MSA	58	38	0	1	97	2.9	0.7
UT Non-Metro	96	42	13	1	152	4.5	1.7
Total	1,945	1,361	32	26	3,364	100	100

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City CSA	\$539,304	\$207,200	\$1,559	\$127,654	\$875,717	91.4	97.6
Logan MSA	\$6,967	\$6,856	\$0	\$10,011	\$23,834	2.5	0.7
UT Non-MSA	\$42,321	\$2,640	\$2,540	\$11,000	\$58,501	6.1	1.7
Total	\$588,592	\$216,696	\$4,099	\$148,665	\$958,052	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked 14th in deposits with a 0.8 percent market share in the AA. In overall HMDA lending, KeyBank ranked 29th with 0.9 percent market share. There was strong competition as reflected by the 439 lenders and 47 depository institutions in the AA. The top three lenders in this market were America First with 9.3 percent market share, Wells Fargo Bank with 7 percent market share and Mountain America with 5.7 percent market share.

In small loans to businesses, KeyBank ranked 15th with a market share of 0.9 percent. There was strong competition as reflected by the 138 lenders. The top three lenders in market share were American Express with 26.9 percent, Chase Bank with 17.1 percent and Citibank with 10 percent.

The bank did not have a sufficient number of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Salt Lake City CSA AA

Home Mortgage Loans

Refer to table O in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate.

For 2017-2018, the proportion of loans in low-income geographies is well below both the aggregate distribution of loans and the proportion of owner-occupied units in those geographies. The proportion of loans in moderate-income geographies is below the aggregate distribution and well below the proportion of owner-occupied units in those geographies. In 2016, the bank's home mortgage lending is stronger than the combined performance in 2017-2018. This performance has a positive impact on the overall rating.

Small Loans to Businesses

Refer to table Q in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses for this evaluation is excellent.

The bank's performance in 2017-2018 for small business loans in LMI geographies exceeds both the aggregate distribution of loans and the proportion of businesses located in those geographies. In 2016, the bank's small business lending is consistent with the performance in 2017-2018.

Small Loans to Farms

Refer to table S in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Salt Lake City CSA AA

Home Mortgage Loans

Refer to table P in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate.

In 2017-2018, the bank's overall home mortgage lending to low-income borrowers is significantly below the proportion of families, and lending to moderate-income borrowers is below the proportion of families. In 2016, the bank's home mortgage lending is good and two rating levels higher than the combined performance in 2017-2018. As such, the performance in 2016 has a positive impact in elevating the overall rating from poor to adequate.

There are homeownership affordability hurdles in the AA especially for LMI borrowers. As noted above, the area's median housing value is 6.4 times the income of low-income, and four times the income of moderate-income, borrowers indicating a limited proportion of owner-occupied units are affordable to LMI. Because of the affordability challenges, the bank's overall home mortgage lending in 2017-2018 to LMI borrowers is well below the aggregate distribution of loans.

Small Loans to Businesses

Refer to table R in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to small businesses of different sizes is good.

For 2017-2018, the bank's distribution of small loans to businesses with revenues of \$1 million or less exceeds the aggregate small business lending data for businesses with revenues of \$1 million or less and is well below the percentage of small businesses located in the AA. In 2016, the bank's performance is consistent with performance in 2017-2018.

Small Loans to Farms

Refer to table T in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

KeyBank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made 24 CD loans in the AA for a total of \$127.7 million, which represents over 25 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. The bank made significant use of innovative and/or complex CD loans and involving many complex projects where the bank often acts in a leadership role. The loans are responsive to the identified affordable housing and small business lending needs in the AA. The bank made 10 CD loans totaling \$100.6 million (78.8 percent) for the purpose of affordable housing. Additionally, the bank extended 14 CD loans totaling \$27 million for the primary purpose of economic development.

Examples of CD loans in the AA include:

KeyBank provided an \$18 million loan for an affordable housing development located in a moderate-income CT in Salt Lake City. The property has 100 percent of the units set aside for tenants making 60 percent of the area MFI.

KeyBank provided a \$28 million loan to finance an affordable housing development in a low-income area in Salt Lake City. This development specifies that 51 percent of the units be allocated to families earning less than 80 percent of the area MFI.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did launch a secured credit card; a no-annual fee credit card designed to assist clients including LMI individuals build and strengthen their credit history.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the non-Metro AA is consistent with the bank's overall performance under the lending test in the full-scope area.

Based on a limited-scope review, the bank's performance in the Logan AA is weaker than the overall performance in the full-scope area due to weaker borrower distribution.

The performance in the limited-scope AAs had a neutral effect on the bank's overall lending test rating for the state.

Refer to tables O through T in the state of Utah section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Utah is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City-Provo-Orem AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salt Lake City CSA	7	\$13,331	12	\$32,658	18	94.7	\$45,950	98.5	9	\$17,387
Logan MSA	0	\$0	0	\$0	0	0	\$0	0	0	\$0
UT Non-MSA	0	\$0	1	\$690	1	5.3	\$690	1.5	0	\$0
Total	7	\$13,331	12	\$33,309	19	100	\$46,640	100	9	\$17,387

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 9 percent of tier 1 capital allocated to the AA. A substantial majority of the bank's CD investments focused on affordable housing, which is an identified credit need in the AA. Additionally, the bank provided one grant totaling \$67 thousand to a nonprofit organization serving LMI families.

CD investments involved numerous complex projects including LIHTC where the bank often acted in a leadership role with participation from federal, state, and local housing agencies, and real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$4 million LIHTC direct investment for an affordable housing development located in Salt Lake City with a majority of the 128-units restricted to individuals earnings less than 80 percent of the area MFI. This activity is responsive to the identified need for affordable housing.

KeyBank entered into a three-year \$200 thousand partnership investment with an organization to implement the Employment Preparation and Placement program. The program is an innovative, evidence-based approach to improving employment outcomes for people managing a substance use disorder and reoccurring behavioral health conditions. The organization primarily serves low-income and no-income adult males with residential and outpatient substance use disorder as well as transitioned housing. The organization serves over 550 individuals annually who struggle with chronic, and often severe, substance use and reoccurring mental health disorders.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the non-Metro AA is consistent with the bank's overall performance in the investment test in the full-scope area.

Based on a limited-scope review, performance in the Logan AA is significantly weaker than performance in the full-scope AA due to no CD investments in the AA.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Utah is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Salt Lake City-Provo-Orem AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*					% of Population within Each Geography*				
				Low	Mod	Mid	Upp	Total	Low	Mod	Mid	Upp	Total
Salt Lake City CSA	97.6	28	90.3	10.7	35.7	32.1	21.4	100	3.8	20.2	46.1	29.5	99.6
Logan MSA	0.7	1	3.2	100	0	0	0	100	6.8	22.2	40.2	30.8	100
UT Non-MSA	1.7	2	6.5	0	0	50.0	50.0	100	0	0	32.1	67.3	99.4

* May not add up to 100.0 percent due to geographies with unknown tract income level and rounding.

The bank's distribution of branches in the AA in low- and moderate-income geographies exceeds the percentage of the population living within those geographies. KeyBank had alternative delivery systems, including debit cards, ATMs, online banking, electronic bill-pay and mobile banking options. These delivery systems provided additional availability and access to banking services to both retail and business customers. KeyBank had 39 ATMs in the AA.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Salt Lake City CSA	0	-2	0	0	-2	0
Logan MSA	0	0	0	0	0	0
UT Non-MSA	0	-1	0	-1	0	0

To the extent changes have been made, the bank's opening and closing of branches in the AA has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open or close any branches in the AA in low- and moderate-income geographies.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday, with extended hours on Friday. Branches are open on Saturday.

Community Development Services

The bank provides a low level of CD services.

KeyBank employees provided two organizations with financial or job-specific expertise and/or technical assistance for 11 CD service activities. The employees logged a total of 63 qualified hours within the AA. The organizations provide affordable housing and community services to LMI individuals and families.

Conclusion for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Logan AA and non-Metro AA is consistent with the bank's overall performance under the service test in the full-scope area.

State of Vermont

CRA rating for the State of Vermont:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Good lending activity
- Good distribution of loans by income level of the borrower
- Adequate distribution of loans by geography
- Leader in CD lending
- Excellent level of qualified CD investments
- Accessible service delivery systems to portions of the AA
- Low level of CD services

Description of Bank's Operations in Vermont

KeyBank delineated two AAs within the state of Vt. Refer to appendix A for a complete description of each AA.

The state of Vermont represents KeyBank's 17th rated area out of 19 rating areas in terms of deposits. KeyBank had \$821.7 million of deposits within its two AAs representing 0.8 percent of adjusted deposits. In Vt., KeyBank ranked third out of 19 depository institutions with 9.2 percent market share. The top bank within these AAs in terms of deposits was People's United Bank with 29.1 percent market share. KeyBank operated 11 branches and 14 ATMs (all deposit-taking) within these AAs, representing 0.9 percent of the bank's branches and one percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$176.6 million in loans, or 0.9 percent of total bank loan originations and purchases, during the evaluation period.

BURLINGTON-SOUTH BURLINGTON MSA

The Burlington-South Burlington MSA was the only AA selected for a full-scope review.

Demographic Data

The following table provides a summary of the demographics that included housing and business information for the Burlington MSA. The median housing value of owner-occupied housing units was 6.4 times the MSA annual income of low-income families and four times that of moderate-income families in the MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Burlington VT MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	45	2.2	22.2	57.8	15.6	2.2
Population by Geography	208,129	1.5	18.5	60.6	19.5	0
Housing Units by Geography	88,913	1.5	20.1	61.6	16.8	0
Owner-Occupied Units by Geography	55,080	1.0	11.7	66.2	21.1	0
Occupied Rental Units by Geography	27,103	2.5	37.1	51.1	9.3	0
Vacant Units by Geography	6,730	1.1	20.0	66.4	12.5	0
Businesses by Geography	17,595	0.9	22.8	53.7	22.3	0.2
Farms by Geography	803	0.1	10.6	68.6	20.7	0
Family Distribution by Income Level	49,940	20.6	17.6	23.0	38.8	0
Household Distribution by Income Level	82,183	23.7	16.1	18.6	41.5	0
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$82,811	Median Housing Value			\$263,977
			Median Gross Rent			\$1,069
			Families Below Poverty Level			6.3%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the September 2018 Moody's Analytics report, the Burlington-South Burlington MSA is struggling to continue its expansion because of the tight labor market. Most industries in the metro area are experiencing employment declines due to labor supply constraints. Labor market tightness is spurring faster average hourly earnings growth. Major employers in the MSA were the University of Vermont Medical Center, the University of Vermont, GlobalFoundries, Shaw's Supermarkets and Wal-Mart Stores. According to the U.S. BLS, the unemployment rate was low and stable throughout the evaluation period, averaging 2.6 percent in 2016, 2.4 percent in 2017 and 2.1 percent in 2018. The unemployment rate in the MSA was lower than the overall state of Vt. unemployment rate which averaged 3.2 percent, three percent and 2.7 percent during the same respective periods. House price appreciation is less than the nation's but has accelerated thanks to stronger wage gains. The share of the population age 65 and older is slightly below the regional average, but the size of this group is expanding almost twice as fast as in the rest of the Northeast.

Community Contacts

The analysis considers comments provided by a community contact serving the Burlington MSA. The contact was with a nonprofit syndication and development company that creates permanently affordable rental housing and enable investments in economic and community development that benefits the residents of Vt. The contact stated that the state's labor force is declining, and the existing population is aging. Therefore, there is a need for safe, decent affordable housing for the elderly and low-income households.

In addition, we reviewed the 2015-2019 Vermont HUD Consolidated Plan. The plan states that there currently exists a gap between housing availability and what is needed by Vermonters. Incomes are not growing as quickly as housing costs across the state. Nearly half (47.5 percent) of Vermont's renters are cost burdened and a third of owner households are as well. Coupled with a statewide vacancy rate near 1 percent in the multifamily rental market and the existence of an unsheltered homeless population, there is a clear need for greater supply of quality housing in much of the state. Additionally, the aging of Vermont's population will increase the need for housing suitable for the elderly in the coming years.

Scope of Evaluation in Vermont

A full-scope review of the Burlington-South Burlington MSA AA was conducted. KeyBank had seven branches in the AA, which was 63.6 percent of the bank's total number of branches in the state of Vt. The bank had a 13.5 percent deposit market share, ranking third among all institutions in the AA. The top competitors were People's United Bank with 29.1 percent market share, TD Bank with 25.2 percent market share and Community Bank with 13.3 percent market share. The AA represented 74.6 percent and 84 percent of the bank's total loans and deposits, respectively, in the state.

The Vt. Non-MSA counties AA received a limited-scope review. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on the bank's performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Vermont

LENDING TEST

The bank's performance under the lending test in Vt. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Burlington	258	307	4	10	579	75.2	84.0
VT Non-MSA	93	91	7	0	191	24.8	16.0
Total	351	398	11	10	770	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Burlington	\$41,429	\$33,103	\$237	\$86,081	\$160,850	91.1	84.0
VT Non-MSA	\$10,236	\$5,048	\$510	\$0	\$15,794	8.9	16.0
Total	\$51,665	\$38,151	\$747	\$86,081	\$176,644	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked third in deposits with a 13.5 percent market share in the AA. In overall HMDA lending, KeyBank ranked 10th with a 2.8 percent market share. There was strong competition as reflected by the 156 other lenders and 12 other depository institutions in the AA. The top three lenders were the New England Federal Credit Union with 24.1 percent market share, Vermont Federal Credit Union with 8.2 percent market share and Northeast Home Loan with 4.8 percent market share.

In small loans to businesses, KeyBank ranked 15th with a market share of 2.1 percent. There was strong competition in the market with 71 other lenders. The top three lenders were American Express with 18.2 percent market share, Chase Bank with 13.1 percent market share and Citibank with 8.4 percent market share. Five of the top six small business lenders were nationwide lenders with large business credit card portfolios that together captured over 51.7 percent of the small loans to businesses.

In small loans to farms, KeyBank did not originate enough loans in the AA to allow for a meaningful analysis. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of Vt. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects adequate distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs exceeds both the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is well below both the percentage of owner-occupied housing and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table Q in the state of Vt. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

In 2017-2018, the bank did not make any small loans to businesses in low-income geographies; however, only 0.9 percent of businesses are located within these geographies. The percentage of small

loans to businesses in moderate-income CTs is near to both the percentage of businesses in moderate-income CTs and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is stronger due to better performance in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Vt. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. Given the median family housing value of \$263,977, it would be difficult for a low-income borrower, who would earn less than \$41,405, to qualify for a home mortgage loan. The percentage of home mortgage loans to moderate-income borrowers exceeds the distribution of moderate-income families and is near to the percentage of loans by all lenders to moderate-income families. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Vt. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is well below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. In 2016, the bank's performance is consistent with 2017-2018.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made a large line of credit available to an agency whose mission is to finance and promote affordable, safe, and decent housing opportunities for LMI residents of Vt. Over the evaluation period, ten draws were made from this line of credit for a total of \$86.1 million. This represents over 98.9 percent of tier 1 capital allocated to the AA. Each draw

provides funds that the agency uses to build LMI multi-family housing projects in the MSA and the state of Vt. CD lending performance has a positive impact on the lending test rating. The bank is one of two banks in the AA that provides this type of financing.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the lending test in the non-MSA AA is consistent with the bank's overall performance under the lending test in the full-scope area.

Refer to tables O through T in the state of Vt. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Vt. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington AA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Burlington	7	\$8,841	3	\$2,630	10	58.8	\$11,471	70.5	4	\$1,820
VT Non-MSA	7	\$4,804	0	\$0	7	41.2	\$4,804	29.5	6	\$280
Total	14	\$13,645	3	\$2,630	17	100	\$16,275	100	10	\$2,100

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 13.6 percent of tier 1 capital allocated to the AA. The investments and grants reflect excellent responsiveness to the needs identified in the AA including affordable housing. All of the investments were LIHTC investments that produced over 238 affordable housing units. The grants and donations were to affordable housing or community service organizations that provide services to LMI individuals.

CD investments involved several complex tax credit projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

An example of a CD investment in the AA includes:

KeyBank provided a \$2.5 million LIHTC investment in a housing equity fund to finance the construction of a mixed-income housing development. The development will have 52 units set aside for LMI individuals. The fund is organized to invest in LMI housing projects in Vt. which may include projects described as work force housing, housing located in growth centers or downtown/village centers or in projects which embrace smart growth and energy efficient principals.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the investment test in the non-MSA AA is consistent with the bank's overall performance under the investment test in the full-scope area.

SERVICE TEST

The bank's performance under the service test in Vt. is rated High Satisfactory.

The rating was impacted by the poor CD service activity in the full-scope area and the excellent performance in the limited-scope area.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington AA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Burlington	0.84	7	64	0	14	86	0	1.5	18.5	60.6	19.4
VT Non-MSA	0.16	4	36	0	25	75	0	0	7.1	75.1	17.8

The bank does not have any branches in the AA in low-income CTs; however, only 1.5 percent of the AA's population lives within these CTs. The bank's distribution of branches in moderate-income geographies is near to the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. KeyBank had 10 ATMs in the AA, all of which were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Burlington	0	1	-	-	-	-1
VT Non-MSA	0	0	-	-	-	-

The bank did not open or close any branches in the AA in LMI CTs.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank provides a low level of CD services.

One employee provided CD services by serving as a board member of an organization that provides emergency shelter, services and housing for people who are homeless or marginally housed in Vt. The employee provided 15 hours of service.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the service test in the non-MSA AA is stronger than the bank's overall performance under the service test in the full-scope area due to better branch distributions. The performance in the limited-scope area had an impact on the overall conclusion.

State of Washington

CRA rating for the State of Washington:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending activity
- Excellent distribution of loans by income level of the borrower
- Good distribution of loans by geography
- A significant level of CD loans, which had a positive impact on the lending test
- Significant level of qualified CD investments
- Accessible service delivery systems to LMI portions of the AA
- Adequate level of CD services

Description of Bank's Operations in Washington

The state of Wash. represents KeyBank's third largest rated area out of 19 rating areas, in terms of deposits. KeyBank delineated seven AAs within the state of Wash. Refer to appendix A for a complete description of each AA.

KeyBank had \$11.4 billion of deposits within its AAs representing 10.6 percent of adjusted deposits. In Wash., KeyBank ranked fifth out of 67 depository institutions with 8.2 percent market share. The top bank within these AAs in terms of deposits was Bank of America with 23 percent market share. Key Bank operated 147 branches and 181 ATMs (159 deposit-taking) within its AAs, representing 12.4 percent of the bank's branches and 12.1 percent of the bank's ATMs. In comparison to the percentage of deposits and branching network, the bank originated and purchased approximately \$3.6 billion in loans, or nine percent of total bank loan originations and purchases, during the evaluation period.

SEATTLE-TACOMA CSA

The Seattle-Tacoma CSA was the only AA selected for a full-scope review. As shown in table A below, the CSA includes the Bremerton-Silverdale, Mount Vernon-Anacortes, Olympia-Tumwater, Seattle-Bellevue-Everett, and Tacoma-Lakewood MSAs.

Demographic Data

The following table provides a summary of the demographics that include housing and business information for the Seattle-Tacoma CSA. The median housing value of owner-occupied housing units is 7.2 times the highest MSA annual income of low-income families and 4.5 times that of moderate-income families in that same MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KeyBank 2018 Seattle WA CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	856	4.9	22.2	44.7	27.1	1.1
Population by Geography	4,251,868	5.0	22.4	45.1	27.3	0.2
Housing Units by Geography	1,768,819	4.9	22.1	45.0	27.8	0.1
Owner-Occupied Units by Geography	999,591	2.3	17.4	48.0	32.2	0
Occupied Rental Units by Geography	644,623	8.9	28.9	40.4	21.6	0.3
Vacant Units by Geography	124,605	5.7	24.4	44.8	25.0	0.1
Businesses by Geography	312,732	5.3	19.7	40.9	33.7	0.4
Farms by Geography	7,452	3.2	16.8	47.9	32.1	0.1
Family Distribution by Income Level	1,042,703	21.0	17.7	21.0	40.3	0
Household Distribution by Income Level	1,644,214	23.5	16.3	18.5	41.7	0
Median Family Income MSA - 14740 Bremerton-Silverdale, WA MSA		\$75,652	Median Housing Value			\$333,093
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$65,272	Median Gross Rent			\$1,171
Median Family Income MSA - 36500 Olympia-Tumwater, WA MSA		\$74,420	Families Below Poverty Level			7.6%
Median Family Income MSA - 42644 Seattle-Bellevue-Everett, WA MD		\$92,317				
Median Family Income MSA - 45104 Tacoma-Lakewood, WA MD		\$71,304				
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100. (*) The NA category consists of geographies that have not been assigned an income classification.						

Economic Data

Based on data from the November 2018 Moody's Analytics report, the Seattle CSA economy continued to increase based on gains in jobs and the presence of a highly trained, well-educated labor force. Job growth levels in this Northwest sector of the country remained well above the Western portion of the country, fueled by high-wage tech industries such as informatics, software publishing and computer systems design. These high wage industries provided some support to individuals and families dealing with rising rents and double-digit house price growth and have been a mitigating factor in job losses from Boeing layoffs. Tariffs on area company products and services, eroding housing affordability and higher tech-hub business costs compared other parts of the country cause some stress on the economy. Major employers in the CSA were Boeing Company, Amazon, Microsoft Corporation and the University of Washington. According to the U.S. BLS, The unemployment rate steadily declined throughout the evaluation period, averaging four percent in 2016, 3.8 percent in 2017 and 3.5 percent in 2018. The unemployment rate in the CSA was lower than the overall state of Wash. unemployment rate which averaged 5.3 percent, 4.7 percent and 4.5 percent during the same respective periods.

Community Contacts

The analysis considers comments provided by 24 community organizations serving the bank's Seattle-Tacoma CSA. The organizations were part of a group listening session. The comments also include information obtained during interviews with two other community groups. The organizations represented affordable housing, workforce development, small business development and social services agencies serving LMI communities. The region is a global center for cloud computing and software development and employs highly trained residents. Single-family and apartment construction is struggling to keep up with the influx of new residents, which has caused housing prices to rise at a double-digit rate. Residents are among the most rent-burdened of those in large U.S. metro areas. According to contacts, low-income residents and seniors are being displaced by rising rents and taxes. Contacts stated that there is a severe affordable housing shortage. Many persons with Section 8 Housing Vouchers cannot find a landlord who will rent to them.

Contacts noted a need for gap financing, low income housing tax credit projects (LIHTC), additional affordable housing, micro loans for small businesses and startup business support, as well as CDFIs needing more access to lines of credit and investments to re-lend to non-profit housing developers. Several community organization representatives remarked that financial education for businesses and consumers are needed. Loans using Individual Taxpayer Identification Numbers (ITIN), second chance checking accounts, secured credit cards and Sharia compliant products were also identified as retail product needs. It was mentioned that KeyBank was one of the banks participating with a banking program that pairs up the bankers with LMI clients.

Scope of Evaluation in Washington

A full-scope review of the Seattle CSA AA was conducted. KeyBank operated 117 branches in the AA, which was 79.6 percent of the bank's total number of branches in the state of Wash. The bank had an 8.4 percent deposit market share, ranking fifth among all institutions in the AA. The top competitors were Bank of America with 25.7 percent market share, Wells Fargo Bank with 12.7 percent market share, Chase Bank with 12.5 percent market share and U.S. Bank with market share of 9.7 percent. The AA represented 87 percent and 88.1 percent of the bank's total loans and deposits, respectively, in the state.

The remaining AAs received limited-scope reviews. One of the AAs is the Wash. non-MSA counties AA. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. The state rating is based on performance in the AAs receiving full- and limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Conclusions With Respect to Performance Tests in Washington

LENDING TEST

The bank's performance under the lending test in Wash. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Seattle-Tacoma AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Seattle-Tacoma WA CSA	5,779	4,098	94	56	10,027	77.9	88.1
WA Non-MSA Counties	820	381	146	2	1,349	10.5	5.6
Yakima	395	143	94	1	633	4.9	2.0
Kennewick-Richland	150	76	14	0	240	1.9	0.6
Bellingham	218	205	10	0	433	3.4	2.3
Wenatchee	38	28	11	1	78	0.6	0.5
Spokane-Spokane Valley	62	42	7	0	111	0.9	0.8
Total	7,462	4,973	376	60	12,871	100	100

Dollar Volume of Loans (000's) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Seattle-Tacoma WA CSA	\$1,832,771	\$420,085	\$6,232	\$842,217	\$3,101,305	87.0	88.1
WA Non-MSA Counties	\$106,027	\$32,891	\$26,607	\$10,854	\$176,379	4.9	5.6
Yakima	\$46,637	\$19,982	\$17,761	\$7,400	\$91,780	2.6	2.0
Kennewick-Richland	\$71,112	\$5,187	\$2,439	\$0	\$78,738	2.2	0.6
Bellingham	\$34,467	\$19,401	\$755	\$0	\$54,623	1.5	2.3
Wenatchee	\$42,559	\$5,476	\$2,581	\$650	\$51,266	1.4	0.5
Spokane-Spokane Valley	\$7,225	\$2,812	\$352	\$0	\$10,389	0.3	0.8
Total	\$2,140,798	\$505,834	\$56,727	\$861,121	\$3,564,480	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

KeyBank ranked fifth in deposits with an 8.4 percent market share in the AA. In overall HMDA lending, KeyBank ranked 12th with 1.7 percent market share. There was strong competition as reflected by the 652 other lenders and 57 other depository institutions in the AA. The top three lenders were Boeing Employees Credit Union with 9.4 percent market share, Wells Fargo Bank with 6.7 percent market share and Chase Bank with 4.2 percent market share.

In small loans to businesses, KeyBank ranked 10th with a market share of 1.4 percent. There was strong competition in the market with 150 other lenders. The top three lenders were Bank of America with 19.3 percent market share, Chase Bank with 15.2 percent market share and American Express with 14.7

percent market share. The top seven small business lenders were nationwide lenders with large business portfolios that together captured over 80.2 percent of the small loans to businesses.

In small loans to farms, KeyBank ranked 12th with a market share of 1.3 percent. There was reasonable competition in the market with 21 other lenders. The top three lenders were Bank of America with 29.2 percent market share, Chase Bank with 19.5 percent market share and U.S. Bank with 16.5 percent market share. The top five small farm lenders were nationwide lenders with large business portfolios that together captured over 81.8 percent of the small loans to businesses. Small farm lending is not a primary product for the bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

More emphasis was placed on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses and small farms. Three AAs had no low-income CTs for the review period.

Home Mortgage Loans

Refer to table O in the state of Wash. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects good distribution.

In 2017-2018, the percentage of home mortgage loans to borrowers in low-income CTs is near to both the percentage of owner-occupied housing in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of home mortgage loans to borrowers in moderate-income CTs is near to both the percentage of owner-occupied housing and the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is weaker than 2017-2018. The performance for 2016 has a neutral impact on this product.

Small Loans to Businesses

Refer to table Q in the state of Wash. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

In 2017-2018, the percentage of small loans to businesses in low-income CTs exceeds both the percentage of businesses in low-income CTs and the percentage of loans by all lenders in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the percentage of businesses in moderate-income CTs, and is higher than the percentage of loans by all lenders in moderate-income CTs. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table S in the state of Wash. section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is good.

In 2017-2018, the percentage of small loans to farms in low-income CTs is below the percentage of farms in low-income CTs and exceeds the percentage of small farm loans by all lenders in low-income CTs. This is reasonable when considering only 3.2 percent of the farms in 2017-2018 are located in low-income CTs and farm lending is not a primary product line for the bank. The percentage of small loans to farms in moderate-income CTs is below the percentage of farms in those CTs and near to the percentage of loans by all lenders in moderate-income CTs. This is reasonable when considering only 3.2 percent of the farms in 2017-2018 were located in low-income CTs.

In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Wash. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels is good.

In 2017-2018, the percentage of home mortgage loans to low-income borrowers is below the distribution of low-income families and exceeds the percentage of loans by all lenders to low-income families. The percentage of home mortgage loans to moderate-income borrowers is near to the distribution of moderate-income families and exceeds the percentage of loans by all lenders to moderate-income families. The banks in this AA faced several obstacles in providing home mortgage loans to LMI borrowers. First, with the median family housing value being at \$333,093, the mortgage payments, without real estate taxes, would be difficult for a low- or moderate-income borrower, who would earn less than \$60,000, to qualify for a home mortgage loan. Second, the number of owner-occupied units were nearly one quarter of the rental units available. This AA did not have a sufficient level of housing stock available for LMI families. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Businesses

Refer to table R in the state of Wash. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small businesses (businesses with revenues of \$1 million or less) is below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeds the percentage of loans by all lenders to small businesses in the AA. The number of businesses located in low-income CTs within this AA are 5 percent of all businesses in the AA. Not only was the pool of LMI borrowers limited, the

number of lenders in the market were 160 with the top three lenders holding over 46.5 percent of the market share. In 2016, the bank's performance is consistent with 2017-2018.

Small Loans to Farms

Refer to table T in the state of Wash. section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is good.

In 2017-2018, the percentage of KeyBank's loans to small farms (farms with revenues of \$1 million or less) is below the percentage of small farms in the AA and exceeds the percentage of loans by all lenders to small farms in the AA. As was discussed in the small loans to businesses section above, there were market availability and competitor challenges in this AA that significantly limited the bank's ability to lend to small businesses. In 2016, a meaningful analysis could not be completed as the bank made less than 20 small loans to farms in the AA.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity tables, shown previously, set forth the information and data used to evaluate the bank's total level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the AA is excellent. KeyBank made 56 CD loans in the AA for a total of \$842.2 million, which represents over 66 percent of tier 1 capital allocated to the AA. CD lending performance has a significant positive impact on the lending test rating. The bank makes significant use of innovative and/or complex CD loans and involving many complex projects where the bank often acts in a leadership role. Most of the CD loans originated (45 loans totaling \$827 million or 98.2 percent) were for the primary purpose of creating affordable housing to assist LMI individuals in the AA. In addition to supporting the creation of affordable housing, the bank extended three loans totaling \$3.4 million for revitalization and stabilization projects within the AA. Another six loans, totaling \$9.3 million, were originated to provide additional community services to assist LMI individuals. And finally, two loans for \$2.5 million were originated for economic development.

Examples of CD loans in the AA include:

KeyBank provided nine loans totaling \$58.3 million to an LMI affordable housing agency (AHA) to supplement their operating capital. By lending these operating capital funds, the AHA was able to offer a variety of housing program types. The AHA provided long-term, low income rental housing and rental assistance to approximately 35,000 people, representing more than 17,000 households. The AHA owns and operates more than 8,000 apartments and single-family homes at nearly 400 sites throughout a major city in the AA. Additionally, this AHA administers more than 10,000 Housing Choice Vouchers, enabling low-income tenants to receive rental assistance with other landlords. This AHA provides LMI tenants with access to services that will help them meet needs beyond housing, such as health care, youth programs/academic support, job training/placement, computer access, mental health counseling, activities for seniors and savings match.

In October 2018, KeyBank provided a \$51.5 million loan to an entity for construction of a 312-unit affordable housing development. All units are income-restricted under the LIHTC regulations. This apartment complex provides rent-restricted housing for residents whose income does not exceed the maximum allowable income for their household size. The total annual income must be at or below \$38,750 for one occupant in the household, \$44,300 for two occupants, \$49,850 for three occupants, etc. This project meets community needs for affordable housing, which is extremely limited for individuals and families.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank's flexibility in underwriting a variety of CD loan projects has given several affordable housing businesses the ability to create thousands of affordable housing units, along with creating temporary and permanent jobs in the AA. The bank has demonstrated innovation by finding the right lending product and utilizing leadership by supporting the AHA's planned development projects.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Yakima AA, Wenatchee AA and Wash. non-MSA counties AAs is weaker than the bank's overall performance under the lending test in the full-scope area.

The performance in the limited-scope areas had a neutral impact on the overall lending test rating for the state of Washington.

Refer to tables O through T in the state of Wash. section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the investment test in Wash. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Seattle-Tacoma CSA AA is excellent.

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Seattle-Tacoma WA CSA	31	\$60,893	28	\$78,913	59	76.4	\$139,806	85.4	26	\$49,924
WA Non-MSA Counties	5	\$7,426	0	\$0	5	9.1	\$7,426	4.6	5	\$302
Yakima	3	\$9,698	0	\$0	3	5.5	\$9,698	6.0	3	\$702
Kennewick-Richland	2	\$689	0	\$0	2	3.6	\$689	0.4	2	\$39
Bellingham	3	\$5,919	0	\$0	3	5.5	\$5,919	3.6	2	\$24
Wenatchee	0	\$0	0	\$0	0	0	\$0	0	0	\$0
Spokane-Spokane Valley	0	\$0	0	\$0	0	0	\$0	0	0	\$0
Total	44	\$84,625	11	\$77,680	55	100	\$162,305	100	38	\$50,991

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The current and prior period investments dollar volume represents 10.9 percent of tier 1 capital allocated to the AA. Prior and current investments are predominantly related to affordable housing with LIHTC investments that produced 2,701 affordable housing units. The remaining investments were related to economic development involving programs such as NMTCs, which is a federal economic development incentive program that attracts private investor capital to community economic development projects. The bank also provided donations of \$1.2 million primarily to community service organizations that provide services to LMI individuals.

CD investments involved several complex LIHTC projects where the bank acted in a leadership role with participation from federal, state, and local housing agencies, and/or real estate developers.

Examples of CD investments in the AA include:

KeyBank provided a \$10.5 million LIHTC investment in a 47-unit affordable housing development serving family affordable/special needs housing. The local and state governments have a stated goal for additional units of permanent supportive housing (PSH) for veterans and families with children. Therefore, 36 units (75 percent of the total) will be allocated to meet these needs, 14 units for U.S. Military Veterans and 22 units for formerly homeless families with children. Twenty-six of these 36 homeless units will benefit from Project-Based Vouchers (14-Veteran Affairs Supportive Housing and 12-Section 8). The remaining 10 units serving homeless families have lowered rents, which will be self-subsidized by the project's rental revenue. The project is in an area with a need for quality, affordable LMI housing.

KeyBank provided a \$10.7 million LIHTC investment for the new construction of 110 units of family affordable housing. The project includes 41 studios, 44 one-bedroom units, 18 two-bedroom units and seven three-bedroom units. Eight of the units will be restricted to tenants earning less than 30 percent AMI, 10 of the units will be restricted to tenants earning less than 50 percent of AMI, and 92 units will be restricted to tenants earning less than 60 percent AMI. The project is in an area with a need for quality, affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the non-MSA, Yakima AA, Kennewick-Richland AA and the Bellingham AA is weaker than the performance in the full-scope area. CD investments were nonexistent for the Wenatchee and Spokane-Spokane Valley AAs.

Performance in the limited-scope areas had a neutral impact on the overall investment test rating.

SERVICE TEST

The bank's performance under the service test in Wash. is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Seattle-Tacoma CSA AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Seattle-Tacoma WA CSA	87.8	117	79.6	8.5	28.2	39.3	23.9	5.0	22.4	45.1	27.3
WA Non-MSA Counties	5.5	14	9.5	0	35.7	64.3	0	1.3	14.1	66.8	17.8
Yakima	2.0	5	3.4	0	60.0	20.0	20.0	0	28.5	42.6	28.9
Kennewick-Richland	0.6	3	2.0	0	66.7	33.3	0	4.5	22.7	31.6	41.2
Bellingham	2.3	6	4.1	0	16.7	50.0	16.7	3.4	7.5	74.3	14.0
Wenatchee	0.5	1	0.7	0	100	0	0	0	8.7	80.8	10.5
Spokane-Spokane Valley	0.8	1	0.7	0	100	0	0	0	49.9	50.1	0
Total	100	147	100								

* May not add up to 100 percent due to geographies with unknown tract income level and rounding.

The bank's distribution of branches in low-income geographies and in moderate-income geographies exceeds the percentage of the population living within those geographies. KeyBank had several alternative delivery systems, including debit cards and ATMs, online banking, electronic bill-pay and mobile banking options. These systems provided additional delivery availability and access to banking

services to both retail and business customers. KeyBank had 150 ATMs in the AA, of which 129 were deposit taking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Seattle-Tacoma WA CSA	0	-6	0	-1	-5	0
WA Non-MSA Counties	0	0	0	0	0	0
Yakima	0	0	0	0	0	0
Kennewick-Richland	0	0	0	0	0	0
Bellingham	0	0	0	0	0	0
Wenatchee	0	0	0	0	0	0
Spokane-Spokane Valley	0	0	0	0	0	0

To the extent changes have been made, the bank's opening and closing of branches in the AA has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. KeyBank did not open any branches and closed one branch in the AA in a moderate-income CT. This closure was due to a consolidation plan for duplicative branches.

Services, including business hours where appropriate, do not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. KeyBank maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and many of the branches had Saturday hours. The branches that were closed on Saturdays were located in areas with minimal retail business activity on the weekend.

Community Development Services

The bank is a leader in providing CD services.

Thirteen employees were actively involved in CD services by providing financial education, technical assistance or serving on boards and committees for a total of 872 hours. These employees provided assistance to LMI families and individuals with filing their local and federal tax returns, including their Earn Income Tax Credit filings, or serving on the board of directors of various community development organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the non-MSA AA, Yakima AA, Kennewick-Richland AA, Wenatchee AA, and Spokane-Spokane Valley AA is stronger than the bank's overall performance under the service test in the full-scope area due to better branch distribution in moderate income CTs. The performance for the Bellingham AA is weaker than the full-scope area.

The performance in a substantial majority of the limited-scope areas had a positive impact on the overall conclusion.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2016 to 12/31/2016 (2010 Census), 1/1/2017 to 12/31/2018 (2015 ACS Survey)	
Bank Products Reviewed:	Home mortgage, small business, small farm loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Cincinnati OH-IN MMSA	Full-scope	OH - Butler, Clermont, Hamilton, Warren
Portland-Vancouver OR-WA Multi State CSA	Full-scope	OR - Benton, Clackamas, Linn, Marion, Multnomah, Polk, Washington, Yamhill WA - Clark, Cowlitz
Youngstown-Warren-Boardman OH-PA MMSA	Full-scope	OH - Mahoning, Trumbull
State		
Alaska		
Anchorage MSA	Full-scope	Anchorage and Mantanuska-Susitna Counties
Fairbanks MSA	Limited-scope	Fairbanks North Star County
AK Non MSA Counties	Limited-scope	Aleutians West, Juneau, Kenai, Ketchikan, Kodiak Island Counties
Colorado		
Denver-Aurora CO CSA	Full-scope	Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson Counties
Colorado Springs MSA	Limited-scope	El Paso County
Fort Collins MSA	Limited-scope	Larimer County
Connecticut		
Hartford-West Hartford-East Hartford MSA	Full-scope	Hartford, Middlesex, Tolland Counties
Bridgeport-Stamford-Norwalk MSA	Limited-scope	Fairfield County
New Haven-Milford MSA	Limited-scope	New Haven County
Worcester MSA	Limited-scope	Windham County
Florida		
Cape Coral-Fort Meyers-Naples CSA	Full-scope	Collier, Lee Counties
West Palm Beach-Boca Raton-Delray Beach MSA	Limited-scope	Palm Beach County

Idaho		
Boise City MSA	Full-scope	Ada, Canyon, Gem Counties
ID Non-MSA Counties	Limited-scope	Bingham, Cassia, Fremont, Madison, Payette, Power, Teton Counties
Idaho Falls MSA	Limited-scope	Booneville County
Pocatello MSA	Limited-scope	Bannock County
Twin Falls MSA	Limited-scope	Twin Falls County
Indiana		
Indianapolis-Carmel-Anderson MSA	Full-scope	Boone, Hamilton, Hendricks, Johnson, Madison, Marion, Morgan, Shelby Counties
Elkhart-Goshen MSA	Limited-scope	Elkhart County
IN Non MSA Counties	Limited-scope	Kosciusko, Marshall, Pulaski, Starke, Steuben Counties
Kokomo MSA	Limited-scope	Howard County
South Bend-Mishawaka IN MMSA	Limited-scope	St. Joseph County
Maine		
Portland-Lewiston-South Portland CSA	Full-scope	Androscoggin, Cumberland, Sagadahoc, York Counties
Bangor MSA	Limited-scope	Penobscot County
ME Non MSA Counties	Limited-scope	Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Piscataquis, Somerset, Waldo Counties
Massachusetts		
Springfield MSA	Full-scope	Hampden County
Michigan		
Detroit-Warren-Ann Arbor MI CSA	Full-scope	Livingston, Monroe, Oakland, Washtenaw, Wayne Counties
MI Non MSA Counties	Limited-scope	Lenawee, St. Joseph Counties
New York		
Buffalo-Cheektowaga-Niagara Falls MSA	Full-scope	Erie, Niagara Counties
Albany-Schenectady CSA	Limited-scope	Albany, Rensselaer, Saratogo, Schenectady, Schoharie, Warren Counties
Binghamton MSA	Limited-scope	Broome, Tioga Counties
Dutchess-Putnam County MSA	Limited-scope	Dutchess, Putnam Counties
Ithaca MSA	Limited-scope	Tomkins County
Kingston MSA	Limited-scope	Ulster County
NYC-Jersey City-White Plains NY MMSA	Limited-scope	New York, Orange, Rockland, Westchester Counties.
NY Non MSA Counties	Limited-scope	Cattaraugus, Cayuga, Chautauqua, Clinton, Columbia, Cortland, Franklin, Fulton, Genesee, Greene, Lewis, Montgomery, Otsego, St. Lawrence, Sullivan, Wyoming Counties
Rochester MSA	Limited-scope	Livingston, Monroe, Ontario, Orleans, Wayne Counties.
Syracuse MSA	Limited-scope	Madison, Onondaga, Oswego Counties
Utica-Rome MSA	Limited-scope	Oneida County
Watertown-Fort Drum MSA	Limited-scope	Jefferson County
Ohio		
Cleveland-Akron-Canton CSA	Full-scope	Carroll, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, Stark, Summit Counties
Columbus	Limited-scope	Delaware, Fairfield, Franklin Counties
Dayton-Springfield-Kettering CSA	Limited-scope	Clark, Greene, Montgomery Counties
Mansfield MSA	Limited-scope	Richland County
OH Non MSA Counties	Limited-scope	Ashtabula, Columbiana, Defiance, Erie, Hancock, Huron, Ottawa, Sandusky Counties
Toledo MSA	Limited-scope	Fulton, Lucas, Wood Counties

Oregon		
Eugene MSA	Full-scope	Lane County
Grants Pass MSA	Limited-scope	Josephine County
Medford MSA	Limited-scope	Jackson County
OR Non MSA Counties	Limited-scope	Hood River County
Pennsylvania		
Pittsburgh MSA	Full-scope	Allegheny, Butler, Fayette, Washington, Westmoreland Counties
Allentown-Bethlehem-Easton PA MMSA	Limited-scope	Carbon, Lehigh, Northampton Counties
East Stroudsburg MSA	Limited-scope	Monroe County
Erie MSA	Limited-scope	Erie County
Montgomery-Bucks-Chester Co MSA	Limited-scope	Montgomery, Bucks, Chester Counties
PA Non MSA Counties	Limited-scope	Warren County
Philadelphia MSA	Limited-scope	Philadelphia County
Reading MSA	Limited-scope	Berks County
Utah		
Salt Lake City-Provo-Orem CSA	Full-scope	Box Elder, Davis, Salt Lake, Tooele, Utah, Weber Counties
Logan UT MMSA	Limited-scope	Cache County
UT Non-MSA Counties	Limited-scope	Summit County
Vermont		
Burlington-South Burlington MSA	Full-scope	Chittenden, Franklin Counties
VT Non-MSA Counties	Limited-scope	Addison, Rutland, Washington, Windham Counties
Washington		
Seattle-Tacoma WA CSA	Full-scope	King, Kitsap, Pierce, Skagit, Snohomish, Thurston Counties
Bellingham MSA	Limited-scope	Whatcom County
Kennewick-Richland MSA	Limited-scope	Benton County
Spokane-Spokane Valley MSA	Limited-scope	Stevens County
Wenatchee MSA	Limited-scope	Chelan County
Yakima MSA	Limited-scope	Yakima County
WA Non-MSA Counties	Limited-scope	Clallam, Grant, Grays Harbor, Island, Lewis, Lincoln, Mason, Pacific, San Juan Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS (KEYBANK)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
KeyBank	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Cincinnati OH IN MMSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Portland-Vancouver OR-WA MCSA	Outstanding	Outstanding	Outstanding	Outstanding
Youngstown-Warren-Boardman OH MMA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Alaska	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Connecticut	Outstanding	Outstanding	Low Satisfactory	Outstanding
Florida	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Idaho	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Maine	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Massachusetts	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Michigan	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Oregon	Outstanding	Outstanding	Low Satisfactory	Outstanding
Pennsylvania	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Utah	High Satisfactory	Outstanding	Outstanding	Outstanding
Vermont	Outstanding	Outstanding	High Satisfactory	Outstanding
Washington	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
 Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Cinci OH KY IN MMA AA	840	94,038	100	54,816	4.3	2.4	3.3	15.9	12	14.5	40.6	36.9	40.1	39	48.6	41.9	0.1	0.1	0.2
Total	840	94,038	100	54,816	4.3	2.4	3.3	15.9	12	14.5	40.6	36.9	40.1	39	48.6	41.9	0.1	0.1	0.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Cincinnati OH KY IN MMA AA	840	94,038	100	54,816	22.3	8	9.6	16.1	15.6	19.2	19.4	19.4	20.2	42.2	55.7	37.4	0	1.3	13.7
Total	840	94,038	100	54,816	22.3	8	9.6	16.1	15.6	19.2	19.4	19.4	20.2	42.2	55.7	37.4	0	1.3	13.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Cinci OH IN MMA	596	64,888	198.7	30,061	7.5	5.7	7.3	18.7	23.8	18.2	33	30.2	31.4	39.5	39.8	42.1	1.2	0.5	0.9
Total	596	64,888	198.7	30,061	7.5	5.7	7.3	18.7	23.8	18.2	33	30.2	31.4	39.5	39.8	42.1	1.2	0.5	0.9
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Cinci OH KY IN MMA AA	596	64,888	100	30,061	80.3	62.6	47.8	7.2	35.1	12.5	2.3
Total	596	64,888	100	30,061	80.3	62.6	47.8	7.2	35.1	12.5	2.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Cinci OH KY IN MMA AA	6	111	100	165	3.2	0	0.6	14.7	16.7	5.5	49	83.3	61.2	32.8	0	32.7	0.3	0	0
Total	6	111	100	165	3.2	0	0.6	14.7	16.7	5.5	49	83.3	61.2	32.8	0	32.7	0.3	0	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Cinci OH KY IN MMA AA	6	111	100	165	95.8	83.3	65.5	2.1	33.3	2.1	0
Total	6	111	100	165	95.8	83.3	65.5	2.1	33.3	2.1	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Portland Vanc OR WA MCSA	3,366	725,171	100	120,939	1.2	1	1.3	18	15.5	19.1	48.6	47.5	48.4	32.1	36	31.2	0	0	0
Total	3,366	725,171	100	120,939	1.2	1	1.3	18	15.5	19.1	48.6	47.5	48.4	32.1	36	31.2	0	0	0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Portland Vanc OR WA MCSA	3,366	725,171	100	120,939	21.4	3.7	3.9	17.4	13.5	15.9	20.4	23.1	25.1	40.8	56.7	43.4	0	3	11.7
Total	3,366	725,171	100	120,939	21.4	3.7	3.9	17.4	13.5	15.9	20.4	23.1	25.1	40.8	56.7	43.4	0	3	11.7

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Portland Vanc OR WA MCSA	2,103	275,476	100	68,830	3.3	4.3	3	22	21.3	21.5	40.4	42.5	40.9	32.2	29.1	33.1	2.1	2.8	1.5
Total	2,103	275,476	100	68,830	3.3	4.3	3	22	21.3	21.5	40.4	42.5	40.9	32.2	29.1	33.1	2.1	2.8	1.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Portland Vanc ORWA Multi St CSA	2,103	275,476	100	68,830	87.1	53.1	48.3	4.6	45.9	8.3	1
Total	2,103	275,476	100	68,830	87.1	53.1	48.3	4.6	45.9	8.3	1
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Portland Vanc ORWA MCSA	148	26,157	100	1,301	2	0	0.8	13.4	4.7	5.9	55	57.4	64	29.3	37.8	29.1	0.4	0	0.2
Total	148	26,157	100	1,301	2	0	0.8	13.4	4.7	5.9	55	57.4	64	29.3	37.8	29.1	0.4	0	0.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Portland Vanc ORWA MCSA	148	26,157	100	1,301	94.5	60.1	50.3	3.8	39.9	1.7	0
Total	148	26,157	100	1,301	94.5	60.1	50.3	3.8	39.9	1.7	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Yngstwn BrdmnOH MMA	186	18,254	100	11,417	5.7	2.2	1.3	13.6	4.3	8.7	49.5	51.1	53.4	31.2	42.5	36.6	0	0	0
Total	186	18,254	100	11,417	5.7	2.2	1.3	13.6	4.3	8.7	49.5	51.1	53.4	31.2	42.5	36.6	0	0	0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Yngstwn Brdmn OH PA MMA	186	18,254	152.5	11,417	21.2	8.1	9.7	18	20.4	21.8	20.5	23.1	24.5	40.3	45.7	31.3	0	2.7	12.7
Total	186	18,254	152.5	11,417	21.2	8.1	9.7	18	20.4	21.8	20.5	23.1	24.5	40.3	45.7	31.3	0	2.7	12.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Yngstwn Brdmn OH PA MMA	74	12,146	100	6,551	8.6	5.4	7.7	13.2	10.8	11.9	40	36.5	38.9	38.2	47.3	41.6	0	0	0
Total	74	12,146	100	6,551	8.6	5.4	7.7	13.2	10.8	11.9	40	36.5	38.9	38.2	47.3	41.6	0	0	0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Yngstwn Brdmn OH PA MMA AA	74	12,146	100	6,551	79.5	58.1	44.4	7	37.8	13.6	4.1
Total	74	12,146	100	6,551	79.5	58.1	44.4	7	37.8	13.6	4.1

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Yngstwn Brdmn OH PA MMA AA	0	0	0	112	2.4	0	0	7.5	0	3.6	49.6	0	47.3	40.4	0	49.1	0	0	0
Total	0	0	0	112	2.4	0	0	7.5	0	3.6	49.6	0	47.3	40.4	0	49.1	0	0	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Yngstwn Brdmn OH PA MMA AA	0	0	0	112	97	0	66.1	1.6	0	1.4	0
Total	0	0	0	112	97	0	66.1	1.6	0	1.4	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 AK Non MSA	91	14,253	27.4	3,160	0.2	0	0	5.9	0	3.8	59.3	57.1	63.9	34.7	42.9	32.3	0	0	0
KeyBank 2018 Anchorage AK MSA	216	32,617	65.1	12,118	1.0	0	0.8	15.9	10.2	14.6	55.1	60.6	58.8	27.9	29.2	25.8	0	0	0
KeyBank 2018 Fairbanks AK MSA	25	3,882	7.5	2,231	0	0	0	6.3	4.0	7.3	61.0	52.0	67.5	32.7	44.0	25.2	0	0	0
Total	332	50,751	100	17,509	0.7	0	0.5	12.3	6.9	11.7	56.9	59.0	60.8	30.1	34.0	26.9	0	0	0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 AK Non MSA	91	14,253	27.4	3,160	17.0	6.6	6.4	15.0	12.1	18.2	22.1	22.0	27.1	45.8	59.3	38.7	0	0	9.7
KeyBank 2018 Anchorage AK MSA	216	32,617	78.5	12,118	19.8	5.1	8.2	18.0	14.4	25.5	22.5	23.6	25.0	39.7	56.0	28.7	0	0.9	12.6
KeyBank 2018 Fairbanks AK MSA	25	3,882	9.1	2,231	18.4	8.0	7.1	18.0	16.0	23.7	23.8	20.0	31.5	39.8	52.0	25.5	0	4.0	12.2
Total	332	50,751	120.7	17,509	19.0	5.7	7.8	17.4	13.9	23.9	22.6	22.9	26.2	41.0	56.6	30.1	0	0.9	12.0
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 AK Non MSA AA	94	12,624	33.0	2,715	0	0	0	2.5	4.3	3.4	64.7	44.7	66.0	32.8	51.1	30.6	0	0	0
KeyBank 2018 Anchorage AK MSA AA	155	35,535	54.4	7,413	3.4	9.0	3.8	26.6	29.0	22.3	49.5	41.3	52.4	20.5	20.6	21.4	0	0	0
KeyBank 2018 Fairbanks AK MSA AA	36	4,924	12.6	1,527	0	0	0	20.8	22.2	16.0	48.0	30.6	48.9	31.2	47.2	35.0	0	0	0
Total	285	53,083	100	11,655	2.2	4.9	2.4	20.3	20.0	17.1	52.7	41.1	55.1	24.8	34.0	25.3	0	0	0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 AK Non MSA AA	94	12,624	37.6	2,715	83.0	68.1	47.7	4.3	30.9	12.7	2.0
KeyBank 2018 Anchorage AK MSA AA	155	35,535	54.4	7,413	84.5	48.4	44.6	6.2	51.0	9.3	1.5
KeyBank 2018 Fairbanks AK MSA AA	36	4,924	13.8	1,527	82.6	72.2	43.0	5.6	22.2	11.9	5.6
Total	285	53,083	100.0	11,655	83.9	57.9	45.1	5.7	40.7	10.4	1.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 AK Non MSA AA	8	110	61.5	142	0.0	0.0	0.0	1.9	0.0	7.7	64.1	50.0	55.6	34.0	50.0	36.6	0.0	0.0	0.0
KeyBank 2018 Anchorage AK MSA AA	3	103	40.0	82	1.3	0.0	0.0	18.2	66.7	18.3	59.7	33.3	64.6	20.8	0.0	17.1	0.0	0.0	0.0
KeyBank 2018 Fairbanks AK MSA AA	2	32	25.0	17	0.0	0.0	0.0	8.4	0.0	11.8	48.2	100.0	47.1	43.4	0.0	41.2	0.0	0.0	0.0
Total	13	245	100.0	241	0.7	0.0	0.0	12.2	15.4	11.6	59.2	53.8	58.1	27.9	30.8	30.3	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 AK Non MSA AA	8	110	61.5	142	90.9	100.0	56.3	6.1	0.0	2.9	0.0
KeyBank 2018 Anchorage AK MSA AA	3	103	23.1	82	94.9	100.0	45.1	2.9	0.0	2.2	0.0
KeyBank 2018 Fairbanks AK MSA AA	2	32	25.0	17	98.2	100.0	70.6	1.8	0.0	0.0	0.0
Total	13	245	100.0	241	94.3	100.0	53.5	3.6	0.0	2.1	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 CO Springs MSA AA	168	180,195	8.3	38,030	3.3	3.0	2.7	20.7	19.0	19.4	42.2	35.7	44.4	33.8	42.3	33.6	0.0	0.0	0.0
KeyBank 2018 Denver CO CSA AA	1,712	626,929	84.7	164,065	4.5	3.1	4.8	18.8	16.9	19.5	35.1	30.7	34.6	41.5	49.3	41.1	0.0	0.0	0.0
KeyBank 2018 Ft Collins MSA AA	141	60,499	7.0	17,554	1.5	0.7	1.3	20.5	19.1	21.4	52.7	57.4	47.4	25.2	22.7	29.9	0.0	0.0	0.0
Total	2,021	867,623	100.0	219,649	4.1	2.9	4.2	19.3	17.2	19.6	37.8	33.0	37.3	38.9	46.9	38.9	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 CO Springs MSA AA	168	180,195	8.3	38,030	20.4	10.1	5.4	18.5	22.0	20.0	20.3	14.3	23.7	40.8	46.4	33.1	0.0	7.1	17.9
KeyBank 2018 Denver CO CSA AA	1,712	626,929	84.7	164,065	21.5	7.0	6.2	17.4	14.0	18.5	20.3	21.8	23.0	40.8	53.0	37.2	0.0	4.2	15.2
KeyBank 2018 Ft Collins MSA AA	141	60,499	7.0	17,554	20.5	12.1	6.1	17.2	17.7	17.0	22.6	24.1	23.6	39.6	41.1	39.1	0.0	5.0	14.1
Total	2,021	867,623	100.0	219,649	21.2	7.6	6.0	17.6	14.9	18.6	20.5	21.3	23.1	40.7	51.7	36.7	0.0	4.5	15.6

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 CO Springs MSA AA	96	13,988	5.9	14,605	7.4	5.2	7.6	23.3	21.9	22.7	33.1	35.4	33.2	36.0	37.5	36.5	0.2	0.0	0.1
KeyBank 2018 Denver CO CSA	1,474	139,809	89.9	92,731	6.3	10.9	7.5	19.5	29.8	20.2	32.9	30.9	31.5	41.0	27.1	40.5	0.3	1.2	0.3
KeyBank 2018 Ft Collins MSA AA	69	5,420	8.2	10,180	3.1	1.4	4.7	28.5	44.9	27.4	42.9	37.7	40.6	25.5	15.9	27.4	0.0	0.0	0.0
Total	1,639	159,217	100.0	117,516	6.2	10.2	7.2	20.8	30.0	21.2	33.8	31.5	32.5	39.0	27.3	38.9	0.3	1.1	0.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 CO Springs MSA AA	96	13,988	7.2	14,605	88.7	60.4	52.5	3.4	37.5	7.9	3.4
KeyBank 2018 Denver CO CSA AA	1,474	139,809	89.9	92,731	88.6	61.0	48.2	4.3	38.1	7.1	1.0
KeyBank 2018 Ft Collins MSA AA	69	5,420	5.1	10,180	89.1	62.3	47.3	3.6	36.2	7.4	2.3
Total	1,639	159,217	100.0	117,516	88.7	61.0	48.7	4.1	38.0	7.2	1.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 CO Springs MSA AA	1	44	33.3	73	5.9	0.0	1.4	21.0	0.0	11.0	43.0	0.0	32.9	29.9	100.0	54.8	0.1	0.0	0.0
KeyBank 2018 Denver CO CSA AA	5	120	100.0	420	7.0	40.0	3.6	19.2	0.0	10.5	33.9	100.0	40.0	39.5	0.0	46.0	0.3	0.0	0.0
KeyBk 2018 Ft Collins MSA AA	0	0	0.0	154	4.1	0.0	1.3	19.4	0.0	7.1	46.6	0.0	51.9	29.9	0.0	39.6	0.1	0.0	0.0
Total	5	120	100.0	647	6.5	40.0	2.8	19.5	0.0	9.7	37.1	100.0	42.0	36.8	20.0	45.4	0.2	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 CO Springs MSA AA	1	44	33.3	73	96.6	100.0	69.9	1.7	0.0	1.7	0.0
KeyBank 2018 Denver CO CSA AA	7	180	100.0	420	95.4	100.0	62.6	2.5	100.0	2.1	0.0
KeyBank 2018 Ft Collins MSA AA	0	0	0.0	154	96.5	0.0	58.4	1.9	0.0	1.6	0.0
Total	8	224	100.0	647	95.7	75.0	62.4	2.3	66.7	1.9	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Bridgeport CT MSA	275	93,417	15.1	23,309	5.1	2.2	4.7	16.1	7.6	15.4	34.6	26.9	33.5	44.2	63.3	46.4	0.0	0.0	0.0
KeyBank 2018 Hartford CT MSA AA	740	250,592	40.7	31,084	3.7	2.2	4.3	10.9	7.3	10.0	42.5	47.4	41.8	42.8	43.1	43.9	0.0	0.0	0.0
KeyBank 2018 New Haven CT MSA AA	712	177,163	39.1	18,943	4.3	4.1	3.9	16.7	12.6	16.4	33.9	29.2	33.6	45.0	54.1	46.1	0.0	0.0	0.0
KeyBank 2018 Worcester CT MSA	92	14,707	5.1	3,398	4.5	2.2	3.8	18.4	16.3	19.2	68.9	68.5	70.1	8.2	13.0	6.9	0.0	0.0	0.0
Total	1,819	535,878	100.0	76,734	4.3	2.9	4.3	14.3	9.9	13.6	39.0	38.3	38.5	42.4	48.9	43.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Bridgeport CT MSA	275	93,417	15.1	23,309	24.6	3.3	7.4	15.6	10.2	17.4	17.8	12.0	18.9	42.0	72.0	44.1	0.0	2.5	12.2
KeyBank 2018 Hartford CT MSA AA	740	250,592	40.7	31,084	22.3	11.5	11.0	16.5	24.6	23.7	20.7	23.9	22.5	40.5	36.9	28.8	0.0	3.1	14.0
KeyBank 2018 New Haven CT MSA AA	712	177,163	39.1	18,943	23.5	10.3	8.3	16.4	22.9	21.0	18.9	27.0	23.7	41.2	37.4	32.3	0.0	2.5	14.7
KeyBank 2018 Worcester CT MSA	92	14,707	7.1	3,398	25.8	12.0	10.6	18.9	26.1	27.7	22.7	35.9	25.0	32.5	22.8	20.1	0.0	3.3	16.6
Total	1,819	535,878	100.0	76,734	23.4	9.8	9.2	16.3	21.8	21.3	19.4	23.9	21.8	40.8	41.7	33.9	0.0	2.8	13.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
KeyBank 2018 Bridgeport CT MSA AA	315	23,415	15.1	32,110	9.5	12.4	9.4	16.4	17.1	16.3	29.8	36.8	30.5	44.3	33.7	43.8	0.0	0.0	0.0	
KeyBank 2018 Hartford CT MSA AA	903	74,666	43.4	28,655	9.6	6.6	9.0	12.1	12.0	12.4	40.6	47.1	40.7	37.3	33.8	37.7	0.4	0.6	0.2	
KeyBank 2018 New Haven CT MSA AA	776	50,066	37.3	21,446	10.3	7.1	8.7	15.2	12.5	14.5	32.8	40.1	33.8	41.2	40.3	42.8	0.5	0.0	0.2	
KeyBank 2018 Worcester CT MSA AA	89	6,842	4.3	1,954	10.3	9.0	9.3	20.9	20.2	19.8	60.3	49.4	63.1	8.5	21.3	7.8	0.0	0.0	0.0	
Total	2,083	154,989	100.0	84,165	9.7	7.8	9.1	14.7	13.3	14.6	35.2	43.0	35.6	40.2	35.7	40.6	0.3	0.2	0.1	
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Bridgeport CT MSA AA	315	23,415	15.1	32,110	87.4	68.9	45.5	5.7	20.0	6.9	11.1
KeyBank 2018 Hartford CT MSA AA	903	74,666	43.4	28,655	84.6	60.2	44.5	5.9	25.5	9.5	14.3
KeyBank 2018 New Haven CT MSA AA	776	50,066	37.3	21,446	85.8	66.1	46.1	5.7	21.0	8.4	12.9
KeyBank 2018 Worcester CT MSA AA	89	6,842	4.3	1,954	84.5	52.8	39.9	5.0	33.7	10.5	25.5
Total	2,083	154,989	100.0	84,165	85.9	63.4	45.2	5.8	23.3	8.3	13.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Bridgeport CT MSA AA	0	0	0.0	69	8.5	0.0	2.9	16.6	0.0	18.8	33.5	0.0	23.2	41.4	0.0	55.1	0.0	0.0	0.0
KeyBank 2018 Hartford CT MSA AA	11	147	52.4	134	2.8	0.0	0.0	8.0	0.0	3.7	41.0	54.5	42.5	48.1	45.5	53.7	0.0	0.0	0.0
KeyBank 2018 New Haven CT MSA AA	6	230	41.7	61	4.7	0.0	1.6	12.1	0.0	3.3	28.3	33.3	16.4	54.9	66.7	78.7	0.0	0.0	0.0
KeyBank2018 Worcester CT MSA AA	4	500	19.0	38	0.8	0.0	0.0	10.3	0.0	7.9	72.4	0.0	71.1	16.5	100.0	21.1	0.0	0.0	0.0
Total	21	877	100.0	302	5.1	0.0	1.0	11.9	0.0	7.6	37.3	38.1	36.4	45.7	61.9	55.0	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Bridgeport CT MSA AA	0	0	0.0	69	96.1	0.0	59.4	2.5	0.0	1.5	0.0
KeyBank 2018 Hartford CT MSA AA	11	147	52.4	134	95.9	81.8	67.2	2.4	25.0	1.7	25.0
KeyBank 2018 New Haven CT MSA AA	6	230	41.7	61	96.1	83.3	60.7	2.3	0.0	1.6	20.0
KeyBank 2018 Worcester CT MSA AA	4	500	25.0	38	96.4	100.0	47.4	2.1	100.0	1.6	0.0
Total	21	877	100.0	302	96.0	71.4	61.6	2.4	33.3	1.6	16.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Cape Coral CSA	112	225,396	80.6	45,267	2.1	0.0	1.5	17.8	8.9	18.8	43.2	29.5	44.2	36.9	61.6	35.5	0.0	0.0	0.0
KeyBank 2018 W Palm FL MSA AA	27	64,214	19.4	47,776	3.1	3.7	2.6	23.3	25.9	21.2	32.7	22.2	34.7	40.6	48.1	41.4	0.2	0.0	0.2
Total	139	289,610	100.0	93,043	2.7	0.7	2.1	21.0	12.2	20.0	37.1	28.1	39.3	39.0	59.0	38.5	0.1	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Cape Coral CSA	112	225,396	125.8	45,267	20.8	3.6	4.0	18.2	3.6	14.7	19.5	14.3	20.5	41.5	68.8	44.7	0.0	9.8	16.2
KeyBank 2018 W Palm FL MSA AA	27	64,214	30.3	47,776	22.8	0.0	5.3	17.3	11.1	15.3	17.8	11.1	20.1	42.1	70.4	44.2	0.0	7.4	15.0
Total	139	289,610	156.2	93,043	21.9	2.9	4.6	17.7	5.0	15.0	18.6	13.7	20.3	41.8	69.1	44.5	0.0	9.4	15.6
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Cape Coral CSA	9	1,848	47.4	32,715	2.8	0.0	2.4	18.8	0.0	17.9	39.8	0.0	39.2	38.5	100.0	40.5	0.1	0.0	0.0
KeyBank 2018 W Palm FL MSA AA	10	4,471	100.0	59,241	5.2	20.0	5.4	20.7	10.0	20.3	29.6	20.0	28.9	43.8	50.0	44.8	0.7	0.0	0.6
Total	19	6,319	190.0	91,956	4.3	10.5	4.4	19.9	5.3	19.4	33.6	10.5	32.6	41.8	73.7	43.2	0.5	0.0	0.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Cape Coral CSA AA	9	1,848	55.6	32,715	90.1	33.3	45.6	3.6	44.4	6.2	22.2
KeyBank 2018 W Palm FL MSA AA	10	4,471	60.0	59,241	90.5	20.0	46.1	3.8	50.0	5.7	30.0
Total	19	6,319	100.0	91,956	90.4	26.3	45.9	3.7	47.4	5.9	26.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Cape Coral CSA	0	0	0.0	149	4.0	0.0	11.4	23.7	0.0	23.5	45.7	0.0	41.6	26.5	0.0	23.5	0.0	0.0	0.0
KeyBank 2018 W Palm FL MSA AA	0	0	0.0	189	5.7	0.0	2.6	21.3	0.0	10.1	33.0	0.0	36.0	39.6	0.0	51.3	0.4	0.0	0.0
Total	0	0	0.0	338	4.9	0.0	6.5	22.4	0.0	16.0	38.9	0.0	38.5	33.6	0.0	39.1	0.2	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Cape Coral CSA AA	0	0	0.0	149	95.9	0.0	49.7	2.7	0.0	1.5	0.0
KeyBank 2018 W Palm FL MSA AA	0	0	0.0	189	95.6	0.0	46.6	3.0	0.0	1.4	0.0
Total	0	0	0.0	338	95.7	0.0	47.9	2.8	0.0	1.4	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Boise ID MSA	799	219,498	59.9	36,305	1.5	1.3	1.7	23.5	19.7	21.3	46.0	43.4	46.6	29.0	35.7	30.4	0.0	0.0	0.0
KeyBank 2018 ID Non MSA	276	38,406	20.7	4,811	3.9	1.8	5.8	2.3	0.4	1.2	76.3	59.4	70.8	17.5	38.4	22.2	0.0	0.0	0.0
KeyBank 2018 Idaho Falls MSA	157	20,894	11.8	5,167	0.0	0.0	0.0	16.3	11.5	16.3	48.7	47.1	48.2	35.0	41.4	35.5	0.0	0.0	0.0
KeyBank 2018 Pocatello ID MSA	45	3,933	3.4	3,087	3.0	8.9	4.1	14.8	4.4	12.6	49.4	55.6	45.1	32.8	31.1	38.2	0.0	0.0	0.0
KeyBank 2018 Twin Falls ID MSA AA	58	7,888	4.3	3,165	0.0	0.0	0.0	2.6	5.2	3.0	84.7	75.9	86.6	12.7	19.0	10.3	0.0	0.0	0.0
Total	1,335	290,617	100.0	52,535	1.7	1.4	1.9	17.6	13.6	17.4	53.6	49.0	51.3	27.1	36.0	29.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Boise ID MSA	799	219,498	59.9	36,305	19.1	6.8	6.2	18.8	18.5	20.1	21.8	21.4	24.9	40.3	48.6	40.3	0.0	4.8	8.5
KeyBank 2018 ID Non MSA	276	38,406	20.7	4,811	21.5	5.4	4.0	17.5	14.5	15.7	20.4	24.6	22.6	40.6	51.8	45.7	0.0	3.6	12.0
KeyBank 2018 Idaho Falls MSA	157	20,894	11.8	5,167	18.8	5.7	6.7	18.7	16.6	18.4	20.6	21.0	23.1	41.8	54.8	39.8	0.0	1.9	11.9
KeyBank 2018 Pocatello ID MSA	45	3,933	5.1	3,087	21.2	8.9	5.2	19.2	20.0	17.0	19.5	26.7	22.4	40.1	40.0	44.3	0.0	4.4	11.1
KeyBank 2018 Twin Falls ID MSA AA	58	7,888	4.3	3,165	18.5	8.6	4.2	18.3	6.9	18.4	22.2	20.7	24.2	41.0	53.4	41.5	0.0	10.3	11.8
Total	1,335	290,617	100.0	52,535	19.6	6.5	5.9	18.6	17.0	19.2	21.3	22.2	24.3	40.6	49.9	41.0	0.0	4.4	9.5

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Boise ID MSA AA	389	46,931	56.6	13,920	10.3	10.5	9.9	25.3	26.5	22.3	36.5	34.4	37.2	27.9	28.5	30.5	0.0	0.0	0.0
KeyBank 2018 ID Non MSA AA	170	17,317	24.7	3,204	9.2	3.5	9.6	4.8	5.3	2.8	70.0	56.5	66.1	16.0	34.7	21.5	0.0	0.0	0.0
KeyBank 2018 Idaho Falls MSA	68	9,218	9.9	2,542	0.0	0.0	0.0	26.9	32.4	22.3	34.4	36.8	37.8	38.7	30.9	39.9	0.0	0.0	0.0
KeyBank 2018Pocatello ID MSA AA	33	3,708	9.2	1,230	11.6	12.1	10.4	20.0	15.2	17.9	45.6	48.5	43.7	22.8	24.2	28.0	0.0	0.0	0.0
KeyBank 2018 Twin Falls ID MSA AA	27	4,357	8.2	1,466	0.0	0.0	0.0	10.3	14.8	8.6	76.4	81.5	76.9	13.3	3.7	14.5	0.0	0.0	0.0
Total	687	81,531	100.	22,362	8.5	7.4	8.1	21.5	20.8	18.4	43.9	42.6	44.4	26.1	29.1	29.1	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Boise ID MSA AA	389	46,931	57.5	13,920	85.3	68.1	48.3	5.0	29.6	9.7	4.4
KeyBank 2018 ID Non MSA	170	17,317	24.7	3,204	82.4	69.4	55.1	5.2	27.6	12.4	5.8
KeyBank 2018 Idaho Falls MSA AA	68	9,218	9.9	2,542	80.7	66.2	45.4	6.7	32.4	12.6	2.9
KeyBank 2018 Pocatello ID MSA AA	33	3,708	4.8	1,230	79.6	42.4	51.7	5.5	57.6	14.9	0.0
KeyBank 2018 Twin Falls ID MSA AA	27	4,357	3.9	1,466	80.6	55.6	49.5	5.4	44.4	14.0	0.0
Total	687	81,531	100.0	22,362	83.8	66.5	49.2	5.2	31.3	11.0	4.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Boise ID MSA AA	21	2,419	22.8	394	4.3	0.0	1.5	25.9	23.8	23.9	46.2	61.9	52.0	23.6	14.3	22.6	0.0	0.0	0.0
KeyBank 2018 ID Non MSA AA	57	3,980	62.0	950	2.7	0.0	0.3	0.5	12.3	0.1	81.4	73.7	78.4	15.4	14.0	21.2	0.0	0.0	0.0
KeyBank 2018 Idaho Falls MSA	1	300	2.1	130	0.0	0.0	0.0	14.2	0.0	2.3	45.5	100.0	55.4	40.3	0.0	42.3	0.0	0.0	0.0
KeyBank 2018 Pocatello ID MSA AA	1	10	2.1	45	2.7	0.0	4.4	13.6	100.0	0.0	55.4	0.0	73.3	28.3	0.0	22.2	0.0	0.0	0.0
KeyBank 2018 Twin Falls ID MSA AA	12	1,391	14.9	204	0.0	0.0	0.0	1.8	0.0	0.5	86.2	83.3	90.7	12.0	16.7	8.8	0.0	0.0	0.0
Total	92	8,100	100.0	1,723	2.9	0.0	0.6	14.4	14.1	5.7	61.3	71.7	72.0	21.4	14.1	21.6	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Boise ID MSA AA	21	2,419	22.8	394	94.4	61.9	62.4	4.1	28.6	1.5	9.5
KeyBank 2018 ID Non MSA	57	3,980	66.7	950	93.2	71.9	71.4	5.8	26.3	1.0	3.3
KeyBank 2018 Idaho Falls MSA AA	1	300	2.1	130	93.6	0.0	73.1	3.6	100.0	2.7	0.0
KeyBank 2018 Pocatello ID MSA AA	1	10	2.1	45	97.3	100.0	55.6	1.1	0.0	1.6	0.0
KeyBank 2018 Twin Falls ID MSA AA	12	1,391	13.0	204	92.3	50.0	54.9	4.3	41.7	3.3	20.0
Total	92	8,100	100.0	1,723	93.9	66.3	67.1	4.5	29.3	1.7	4.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Elkhart IN MSA AA	270	22,753	10.2	6,604	0.4	0.7	0.2	12.3	13.7	10.3	63.7	62.6	65.4	23.7	23.0	24.0	0.0	0.0	0.0
KeyBank 2018 IN Non MSA	181	14,337	6.9	6,492	0.0	0.0	0.0	5.3	8.3	4.8	79.3	78.5	77.8	15.5	13.3	17.4	0.0	0.0	0.0
KeyBank 2018 Indianapolis MSA AA	1,846	261,177	69.9	72,031	6.7	3.4	4.5	17.8	12.5	15.2	36.4	41.8	35.0	39.1	42.3	45.3	0.1	0.0	0.0
KeyBank 2018 Kokomo IN MSA AA	155	13,543	5.9	2,628	6.3	2.6	4.8	14.2	7.1	8.8	48.7	64.5	52.2	30.8	25.8	34.2	0.0	0.0	0.0
KeyBank 2018 South Bend IN MSA AA	188	25,737	7.1	7,444	4.9	4.8	3.5	15.0	13.3	10.2	44.4	42.6	48.1	35.7	39.4	38.2	0.0	0.0	0.0
Total	2,640	337,547	100.0	95,199	5.4	3.0	3.8	15.8	12.1	13.6	43.6	47.8	41.6	35.2	37.1	41.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Elkhart IN MS A AA	270	22,753	10.2	6,604	19.0	12.2	6.7	18.1	27.0	20.7	23.4	27.4	24.9	39.5	30.4	33.1	0.0	3.0	14.5
KeyBank 2018 IN Non MSA	181	14,337	6.9	6,492	15.4	11.1	6.8	19.2	25.4	19.5	23.9	30.4	23.8	41.6	28.7	37.5	0.0	4.4	12.4
KeyBank 2018 Indianapolis MSA AA	1,846	261,177	69.9	72,031	22.3	10.3	10.4	17.3	20.2	20.5	19.4	20.1	20.3	41.0	46.7	33.8	0.0	2.7	15.0
KeyBank 2018 Kokomo IN MSA	155	13,543	5.9	2,628	22.2	8.4	10.7	16.6	25.2	22.6	21.1	16.8	23.7	40.0	48.4	25.5	0.0	1.3	17.5
KeyBank 2018 South Bend IN MSA AA	188	25,737	7.1	7,444	22.1	13.8	9.8	16.7	20.7	21.0	20.1	22.9	22.1	41.2	36.7	33.5	0.0	5.9	13.6
Total	2,640	337,547	100.0	95,199	21.5	10.7	9.8	17.4	21.6	20.6	20.2	21.6	21.1	40.9	43.2	33.8	0.0	3.0	14.7

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Elkhart IN MSA	88	7,279	7.6	2,817	1.2	0.0	1.3	15.6	15.9	13.2	63.8	67.0	67.2	19.4	17.0	18.3	0.0	0.0	0.0
KeyBank 2018 IN Non MSA AA	80	6,588	6.9	2,859	0.0	0.0	0.0	12.9	10.0	12.2	73.6	82.5	72.1	13.5	7.5	15.7	0.0	0.0	0.0
KeyBank 2018 Indianapolis MSA AA	786	67,529	128.9	32,099	9.0	8.5	8.3	19.6	18.2	17.3	32.4	38.3	31.1	38.9	34.9	43.2	0.1	0.1	0.2
KeyBank 2018 Kokomo IN MSA	74	2,773	6.4	775	11.5	20.3	11.0	19.1	16.2	18.3	46.6	44.6	45.5	22.7	18.9	25.2	0.0	0.0	0.0
KeyBank 2018 South Bend IN MSA AA	128	14,020	11.1	3,629	12.1	5.5	10.3	16.3	26.6	15.5	42.6	42.2	43.7	29.0	25.8	30.5	0.0	0.0	0.0
Total	1,156	98,189	189.5	42,179	8.2	7.7	7.5	18.5	18.3	16.5	38.9	44.4	37.6	34.3	29.6	38.3	0.1	0.1	0.1

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Elkhart IN MSA AA	88	7,279	7.6	2,817	77.5	69.3	35.5	9.7	26.1	12.8	4.5
KeyBank 2018 IN Non MSA	80	6,588	6.9	2,859	79.8	67.5	46.2	6.1	32.5	14.1	0.0
KeyBank 2018 Indianapolis MSA AA	786	67,529	68.0	32,099	81.9	65.3	41.8	6.4	33.8	11.7	0.9
KeyBank 2018 Kokomo IN MSA AA	74	2,773	7.4	775	79.2	90.5	48.0	5.0	9.5	15.8	0.0
KeyBank 2018 South Bend IN MSA AA	128	14,020	11.1	3,629	79.0	63.3	41.9	6.8	35.9	14.2	1.9
Total	1,156	98,189	100.0	42,179	81.1	67.1	41.8	6.7	31.8	12.3	1.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Elkhart IN MSA AA	2	25	11.8	88	0.0	0.0	0.0	5.6	0.0	3.4	64.8	100.0	63.6	29.6	0.0	33.0	0.0	0.0	0.0
KeyBank 2018 IN Non MSA AA	3	27	17.6	418	0.0	0.0	0.0	2.6	0.0	0.2	83.9	100.0	84.7	13.6	0.0	15.1	0.0	0.0	0.0
KeyBank 2018 Indianapolis MSA AA	25	1,401	73.5	498	4.2	0.0	0.8	11.9	20.0	2.8	49.0	68.0	69.3	34.7	12.0	27.1	0.1	0.0	0.0
KeyBank 2018 Kokomo IN MSA AA	3	198	11.8	122	1.7	0.0	0.0	5.0	0.0	0.0	46.9	66.7	59.8	46.5	33.3	40.2	0.0	0.0	0.0
KeyBank 2018 South Bend IN MSA	1	10	5.9	111	3.3	0.0	0.0	6.8	0.0	0.9	42.2	0.0	34.2	47.7	100.0	64.9	0.0	0.0	0.0
Total	34	1,661	100.0	1,237	2.9	0.0	0.3	9.0	14.7	1.5	56.1	70.6	70.0	31.9	14.7	28.1	0.1	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Elkhart IN MSA AA	2	25	11.8	88	97.4	100.0	36.4	1.5	0.0	1.1	0.0
KeyBank 2018 IN Non MSA	3	27	17.6	418	96.2	100.0	64.1	2.5	0.0	1.4	0.0
KeyBank 2018 Indianapolis MSA AA	25	1,401	73.5	498	95.7	76.0	53.2	2.4	24.0	1.9	0.0
KeyBank 2018 Kokomo IN MSA AA	3	198	8.8	122	98.8	100.0	61.5	0.8	0.0	0.4	0.0
KeyBank 2018 South Bend IN MSA AA	1	10	5.9	111	95.8	100.0	74.8	3.5	0.0	0.7	0.0
Total	34	1,661	100.0	1,237	96.1	82.4	58.4	2.4	17.6	1.6	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Bangor ME MSA AA	182	16,965	8.6	4,080	0.0	0.0	0.0	13.4	13.7	10.5	61.0	51.1	60.3	25.3	35.2	29.2	0.3	0.0	0.0
KeyBank 2018 ME Non MSA	860	92,924	40.8	12,253	0.0	0.0	0.0	6.6	7.6	6.2	75.8	74.0	73.3	17.3	18.4	19.9	0.3	0.1	0.7
KeyBank 2018 Portland ME CSA	1,068	188,935	50.6	23,984	1.2	2.2	2.2	14.7	16.2	16.6	63.0	56.6	59.5	21.2	25.1	21.8	0.0	0.0	0.0
Total	2,110	298,824	100.0	40,317	0.5	1.1	1.3	11.1	12.5	12.8	68.2	63.2	63.7	20.0	23.2	21.9	0.2	0.0	0.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Bangor ME MSA AA	182	16,965	8.6	4,080	21.1	7.7	6.3	17.7	16.5	17.8	20.5	23.1	21.7	40.7	48.4	36.8	0.0	4.4	17.4
KeyBank 2018 ME Non MSA	860	92,924	40.8	12,253	20.0	7.2	6.5	18.2	21.0	17.1	20.8	22.8	21.5	41.1	46.7	41.7	0.0	2.2	13.2
KeyBank 2018 Portland ME CSA	1,068	188,935	50.6	23,984	21.0	8.8	6.5	17.5	19.9	19.4	22.0	23.5	22.8	39.6	44.8	36.7	0.0	3.0	14.5
Total	2,110	298,824	100.0	40,317	20.6	8.1	6.5	17.8	20.1	18.6	21.3	23.2	22.3	40.3	45.9	38.2	0.0	2.8	14.4
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Bangor ME MSA AA	99	4,633	9.8	3,059	0.0	0.0	0.0	20.7	19.2	14.8	49.4	53.5	56.7	28.8	27.3	28.4	1.1	0.0	0.1
KeyBank 2018 ME Non MSA	363	18,303	35.8	10,290	0.0	0.0	0.0	6.6	7.2	5.4	75.1	76.3	73.3	17.9	16.5	20.7	0.4	0.0	0.6
KeyBank 2018 Portland ME CSA AA	553	47,886	54.5	14,437	4.2	2.4	3.5	23.8	23.0	21.2	52.2	48.8	53.0	19.9	25.9	22.2	0.0	0.0	0.0
Total	1,015	70,822	100.0	27,786	2.2	1.3	1.8	16.9	16.9	14.7	60.6	59.1	61.0	20.0	22.7	22.3	0.3	0.0	0.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Bangor ME MSA AA	99	4,633	10.6	3,059	75.5	74.7	45.6	8.1	24.2	16.4	1.9
KeyBank 2018 ME Non-MSA AA	363	18,303	35.8	10,290	79.4	80.2	50.1	6.2	17.9	14.4	1.9
KeyBank 2018 Portland ME CSA AA	553	47,886	54.5	14,437	81.1	71.6	44.3	7.1	26.4	11.8	2.0
Total	1,015	70,822	100.0	27,786	79.9	75.0	46.6	6.9	23.2	13.3	1.9
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Bangor ME MSA	10	1,022	7.8	55	0.0	0.0	0.0	9.4	10.0	3.6	68.7	90.0	78.2	21.6	0.0	18.2	0.3	0.0	0.0
KeyBank 2018 ME Non MSA	95	7,794	74.2	711	0.0	0.0	0.0	4.9	3.2	4.1	79.5	87.4	80.7	15.5	9.5	14.9	0.1	0.0	0.3
KeyBank 2018 Portland ME CSA AA	23	1,046	18.0	131	0.9	0.0	0.8	13.4	21.7	9.9	64.5	60.9	68.7	21.2	17.4	20.6	0.0	0.0	0.0
Total	128	9,862	100.0	897	0.4	0.0	0.1	8.9	7.0	4.9	72.1	82.8	78.8	18.5	10.2	15.9	0.1	0.0	0.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Bangor ME MSA AA	10	1,022	7.8	55	92.3	60.0	47.3	5.2	40.0	2.6	0.0
KeyBank 2018 ME Non-MSA AA	95	7,794	74.2	711	96.5	67.4	77.5	2.5	31.6	1.0	2.4
KeyBank 2018 Portland ME CSA AA	23	1,046	20.3	131	95.5	78.3	58.0	2.8	41.7	1.7	0.0
Total	128	9,862	100.0	897	95.7	68.8	72.8	2.8	30.5	1.4	1.7
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Springfield MA MSA	189	24,285	100.0	11,552	6.4	1.1	7.8	16.1	16.9	18.9	34.5	31.7	34.4	43.0	50.3	38.9	0.0	0.0	0.0
Total	189	24,285	100.0	11,552	6.4	1.1	7.8	16.1	16.9	18.9	34.5	31.7	34.4	43.0	50.3	38.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Springfield MA MSA	189	24,285	171.8	11,552	27.2	11.6	8.5	16.5	25.9	24.6	17.6	24.9	22.9	38.7	36.5	27.8	0.0	1.1	16.2
Total	189	24,285	171.8	11,552	27.2	11.6	8.5	16.5	25.9	24.6	17.6	24.9	22.9	38.7	36.5	27.8	0.0	1.1	16.2

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
KeyBank 2018 Springfield MA MSA AA	190	15,320	100.0	9,018	20.1	11.1	17.5	20.9	15.8	20.2	24.7	30.5	26.3	34.3	42.6	36.0	0.0	0.0	0.0	
Total	190	15,320	100.0	9,018	20.1	11.1	17.5	20.9	15.8	20.2	24.7	30.5	26.3	34.3	42.6	36.0	0.0	0.0	0.0	
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Springfield M A MSA AA	190	15,320	100.0	9,018	81.0	60.5	39.5	6.8	27.9	12.2	11.6
Total	190	15,320	100.0	9,018	81.0	60.5	39.5	6.8	27.9	12.2	11.6
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Springfield MA MSA AA	1	50	100.0	20	3.8	0.0	10.0	9.9	0.0	10.0	29.3	0.0	15.0	57.0	100.0	65.0	0.0	0.0	0.0
Total	1	50	100.0	20	3.8	0.0	10.0	9.9	0.0	10.0	29.3	0.0	15.0	57.0	100.0	65.0	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Springfield MA MSA AA	1	50	100.0	20	96.5	0.0	60.0	1.6	0.0	1.9	100.0
Total	1	50	100.0	20	96.5	0.0	60.0	1.6	0.0	1.9	100.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Detroit MI CSA	903	207,988	82.6	110,603	6.1	1.6	2.4	15.6	7.0	10.4	34.5	44.3	36.9	43.5	47.2	50.2	0.2	0.0	0.1
KeyBank 2018 MI Non MSA	190	16,276	17.4	4,538	0.0	0.0	0.0	12.7	13.7	10.6	61.8	54.2	58.8	25.5	32.1	30.6	0.0	0.0	0.0
Total	1,093	224,264	100.0	115,141	5.8	1.3	2.3	15.5	8.1	10.4	35.8	46.0	37.8	42.7	44.6	49.4	0.2	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Detroit MI CSA AA	903	207,988	82.6	110,603	22.1	6.0	6.8	15.6	15.5	17.3	18.1	18.8	22.6	44.2	56.0	41.8	0.0	3.7	11.5
KeyBank 2018 MI Non MSA	190	16,276	25.0	4,538	17.4	10.0	6.7	18.1	15.8	19.2	22.1	30.0	24.4	42.4	43.7	34.3	0.0	0.5	15.5
Total	1,093	224,264	100.0	115,141	21.8	6.7	6.8	15.7	15.6	17.4	18.3	20.8	22.7	44.1	53.9	41.5	0.0	3.1	11.6
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Detroit MI CSA AA	423	49,197	86.3	78,217	7.6	6.4	6.7	17.0	11.1	16.0	29.5	46.1	29.1	44.7	35.9	47.5	1.1	0.5	0.8
KeyBank 2018 MI Non MSA AA	67	7,416	13.7	1,651	0.0	0.0	0.0	20.1	25.4	18.0	57.1	56.7	57.4	22.8	17.9	24.6	0.0	0.0	0.0
Total	490	56,613	100.0	79,868	7.3	5.5	6.6	17.1	13.1	16.0	30.4	47.6	29.7	44.0	33.5	47.0	1.1	0.4	0.8
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Detroit MI CSA AA	423	49,197	86.3	78,217	82.3	60.8	46.0	7.4	38.3	10.4	2.1
KeyBank 2018 MI Non MSA AA	67	7,416	13.7	1,651	80.4	61.2	46.2	6.1	38.8	13.5	0.0
Total	490	56,613	100.0	79,868	82.2	60.8	46.0	7.3	38.4	10.5	1.8
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Detroit MI CSA AA	11	260	91.7	366	4.4	0.0	0.8	11.5	0.0	6.0	44.9	81.8	59.0	39.1	18.2	33.6	0.1	0.0	0.5
KeyBank 2018 MI Non MSA AA	1	15	11.1	219	0.0	0.0	0.0	3.0	0.0	1.8	71.7	0.0	74.0	25.3	100.0	24.2	0.0	0.0	0.0
Total	12	275	100.0	585	3.8	0.0	0.5	10.5	0.0	4.4	48.2	75.0	64.6	37.4	25.0	30.1	0.1	0.0	0.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Detroit MI CSA AA	11	260	91.7	366	95.1	54.5	53.8	3.0	45.5	1.9	0.0
KeyBank 2018 MI Non MSA AA	1	15	11.1	219	96.6	100.0	39.7	1.8	0.0	1.6	0.0
Total	12	275	100.0	585	95.3	58.3	48.5	2.9	41.7	1.9	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Albany Schenectady CSA AA	1,398	258,398	10.6	26,148	2.6	2.6	2.6	13.7	10.4	13.0	56.7	53.0	56.8	26.9	33.9	27.6	0.0	0.1	0.1
Binghamton NY MSA	130	9,851	1.0	4,647	2.7	2.3	2.5	9.3	13.1	9.4	60.1	59.2	56.4	27.9	25.4	31.6	0.0	0.0	0.0
Buffalo NY MSA	5,135	682,749	38.9	28,852	6.9	3.9	4.4	11.4	8.7	9.5	43.8	43.0	44.4	37.9	44.4	41.6	0.0	0.0	0.0
Dutchess Putnam NY MSA AA	496	77,009	3.8	8,809	1.5	1.2	1.8	9.8	9.1	9.8	61.5	62.9	61.3	27.2	26.8	27.1	0.0	0.0	0.0
Ithaca NY MSA	35	5,305	0.3	1,396	0.0	0.0	0.0	12.2	20.0	11.2	70.6	54.3	69.6	17.0	25.7	18.3	0.2	0.0	0.9
Kingston NY MSA	210	26,519	1.6	3,575	1.8	1.9	1.9	7.1	5.7	6.4	59.0	65.7	58.3	32.0	26.7	33.4	0.0	0.0	0.0
2018 NY NonMSA	1,840	185,493	13.9	18,110	0.8	0.9	0.8	7.8	7.9	7.5	75.5	70.8	73.0	15.8	20.4	18.6	0.0	0.0	0.0
NYC JC WP NY NJ MMA	1,171	234,924	8.9	48,319	1.5	1.8	2.8	6.6	4.3	7.9	12.6	12.3	13.0	79.0	81.6	76.0	0.3	0.0	0.2
Rochester MSA AA	1,317	296,584	10.0	29,425	3.4	1.3	2.8	11.6	9.9	10.6	51.9	50.9	50.6	33.0	37.7	36.0	0.0	0.1	0.0
Syracuse NY MSA	905	114,630	6.9	15,367	2.6	1.7	2.0	14.0	9.6	12.7	51.7	46.3	50.6	31.6	42.3	34.6	0.1	0.1	0.1
Utica NY MSA	400	79,425	3.0	4,668	6.6	15.0	5.5	7.7	9.3	7.9	50.8	31.5	47.9	35.0	44.3	38.7	0.0	0.0	0.0
Watertown NY MSA	174	16,803	1.3	2,457	0.0	0.0	0.0	7.9	4.6	8.9	83.2	87.4	82.8	8.9	8.0	8.3	0.0	0.0	0.0
Total	13,211	1,987,690	100.0	191,773	2.8	2.9	2.7	9.8	8.6	9.7	46.1	47.7	44.4	41.2	40.8	43.1	0.1	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany Schenectady CSA AA	1,398	258,398	10.6	26,148	20.2	10.2	9.2	17.6	22.8	22.6	22.3	22.7	25.4	39.9	40.3	34.4	0.0	3.9	8.5
Binghamton NY MSA	130	9,851	1.5	4,647	21.6	18.5	9.6	16.9	25.4	22.8	21.6	23.8	24.6	39.9	31.5	33.7	0.0	0.8	9.3
Buffalo NY MSA	5,135	682,749	38.9	28,852	22.2	10.0	9.7	16.6	22.9	22.7	20.3	23.5	23.5	40.9	40.8	32.3	0.0	2.8	11.8
Dutchess Putnam NY MSA AA	496	77,009	3.8	8,809	20.4	9.5	6.3	17.5	20.8	19.3	22.4	23.4	25.8	39.7	43.8	38.9	0.0	2.6	9.7
Ithaca NY MSA	35	5,305	0.8	1,396	21.0	5.7	9.0	16.7	22.9	22.7	21.2	25.7	23.9	41.0	45.7	36.5	0.0	0.0	7.8
Kingston NY MSA	210	26,519	1.6	3,575	21.9	13.8	5.3	17.0	19.5	17.7	20.1	28.6	25.3	41.0	36.2	44.0	0.0	1.9	7.8
NY Non MSA	1,840	185,493	13.9	18,110	21.0	7.6	6.7	17.3	19.8	19.0	21.4	27.0	24.1	40.2	43.2	39.5	0.0	2.6	10.8
NYC JC WP NY NJ MMA	1,171	234,924	8.9	48,319	21.1	2.1	1.3	11.8	10.7	5.9	12.8	17.3	13.1	54.3	67.7	65.2	0.0	2.3	14.5
Rochester MSA AA	1,317	296,584	10.0	29,425	21.9	10.9	8.6	17.1	23.5	21.8	19.9	21.4	22.1	41.2	41.0	34.0	0.0	3.1	13.5
Syracuse NY MSA AA	905	114,630	6.9	15,367	21.8	8.4	9.8	17.2	21.1	22.5	20.4	22.9	23.0	40.6	45.1	34.8	0.0	2.5	9.8
Utica NY MSA	400	79,425	3.0	4,668	22.4	15.0	7.9	15.9	22.0	20.1	21.3	24.3	24.4	40.4	36.8	38.5	0.0	2.0	9.1
Watertown NY MSA	174	16,803	1.3	2,457	19.8	6.3	5.9	18.3	24.1	16.4	22.4	23.6	25.2	39.5	44.3	43.2	0.0	1.7	9.3
Total	13,211	1,987,690	100.0	191,773	21.3	9.2	6.7	15.4	21.2	17.5	18.4	23.2	21.2	44.9	43.7	42.9	0.0	2.8	11.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albany Schenectady CSA AA	1,729	149,898	16.0	15,536	10.4	9.1	8.2	12.7	14.5	11.7	51.3	47.0	51.0	25.2	29.0	29.0	0.4	0.5	0.3
Binghamton NY MSA	241	8,929	2.2	3,094	10.0	12.0	8.8	11.5	14.5	11.7	58.6	57.3	58.1	20.0	16.2	21.5	0.0	0.0	0.0
Buffalo NY MSA AA	2,354	180,143	21.8	15,888	9.1	10.4	8.8	12.2	10.0	11.2	37.9	39.0	36.4	37.2	38.6	41.4	3.6	2.0	2.2
Dutchess Putnam NY MSA AA	537	21,260	5.0	9,172	5.2	3.5	3.8	13.8	12.5	12.6	54.2	49.2	53.3	26.8	34.8	30.3	0.0	0.0	0.0
Ithaca NY MSA AA	35	1,676	0.6	1,591	0.0	0.0	0.0	16.0	0.0	16.0	47.6	57.1	48.7	33.9	40.0	30.7	2.5	2.9	4.6
Kingston NY MSA	143	9,714	2.6	3,931	2.3	0.7	1.6	8.3	4.2	7.0	58.1	74.1	58.5	31.3	21.0	32.9	0.0	0.0	0.0
NY Non MSA AA	1,364	85,735	12.6	13,731	3.2	3.2	2.8	12.8	12.8	11.5	67.5	62.8	67.7	16.3	21.3	18.0	0.2	0.0	0.0
NYC JC WP NY NJ MMA AA	1,682	105,025	15.6	148,984	4.9	6.4	6.0	8.2	13.4	8.0	8.5	15.3	7.9	74.6	64.4	75.0	3.9	0.5	3.1
Rochester MSA AA	1,337	113,598	12.4	17,862	9.2	10.8	7.6	13.7	14.9	12.6	44.7	48.0	43.5	32.1	26.3	36.3	0.3	0.0	0.1
Syracuse NY MSA	1,071	85,631	9.9	10,326	8.0	7.3	6.8	14.6	14.1	12.4	44.0	41.6	43.6	31.1	34.6	35.4	2.4	2.3	1.9
Utica NY MSA AA	209	18,441	1.9	3,070	14.8	16.3	13.6	14.2	18.7	12.3	39.2	33.5	37.9	29.9	27.8	34.4	1.9	3.8	1.9
Watertown NY MSA	95	8,336	0.9	1,581	0.0	0.0	0.0	18.2	8.4	13.7	75.7	86.3	79.9	6.0	5.3	6.5	0.1	0.0	0.0
Total	10,797	788,386	100.	244,766	6.3	8.0	6.2	10.6	12.9	9.5	29.4	42.7	24.2	51.1	35.5	57.9	2.5	0.9	2.2

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Albany Schenectady CSA AA	1,729	149,898	16.0	15,536	80.1	59.6	44.0	6.4	30.5	13.5	9.8
KeyBank 2018 Binghamton NY MSA AA	241	8,929	2.2	3,094	78.5	67.6	42.8	6.6	20.7	14.8	11.6
KeyBank 2018 Buffalo NY MSA AA	2,354	180,143	21.8	15,888	80.1	65.0	44.0	7.4	25.8	12.5	9.1
KeyBank 2018 Dutchess Putnam NY MSA AA	537	21,260	5.0	9,172	86.5	78.8	46.2	4.9	14.9	8.6	6.3
KeyBank 2018 Ithaca NY MSA AA	35	1,676	0.3	1,591	78.6	82.9	46.8	6.1	6.3	15.3	14.3
KeyBank 2018 Kingston NY MSA AA	143	9,714	1.3	3,931	85.7	74.1	45.1	4.6	24.5	9.7	3.0
KeyBank 2018 NY Non MSA AA	1,364	85,735	12.6	13,731	78.5	68.4	45.8	6.2	23.0	15.3	8.6
KeyBank 2018 NYC JC WP NY NJ MMA AA	1,682	105,025	15.6	148,984	82.3	65.0	38.6	9.3	29.0	8.4	6.0
KeyBank 2018 Rochester MSA AA	1,337	113,598	12.4	17,862	80.6	63.1	44.8	7.2	30.1	12.2	6.8
KeyBank 2018 Syracuse NY MSA AA	1,071	85,631	9.9	10,326	78.8	69.4	44.1	7.1	25.4	14.1	5.2
KeyBank 2018 Utica NY MSA AA	209	18,441	1.9	3,070	78.4	67.0	46.8	7.1	21.1	14.5	12.0
KeyBank 2018 Watertown NY MSA AA	95	8,336	0.9	1,581	74.6	68.4	48.1	7.0	28.4	18.4	3.2
Total	10,797	788,386	100.0	244,766	81.2	65.8	41.0	8.0	26.4	10.8	7.8
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albany Schenectady	23	718	8.4	135	1.4	0.0	0.7	12.1	8.7	23.7	65.7	43.5	63.7	20.6	47.8	11.9	0.1	0.0	0.0
Binghamton NY MSA	0	0	0.0	60	1.9	0.0	0.0	5.4	0.0	0.0	75.2	0.0	80.0	17.6	0.0	20.0	0.0	0.0	0.0
Buffalo NY MSA AA	45	1,446	17.1	192	3.3	0.0	0.5	4.0	2.2	3.1	49.2	55.6	65.1	42.7	42.2	31.3	0.9	0.0	0.0
Dutchess Putnam NY MSA AA	14	312	6.3	56	0.6	0.0	0.0	10.9	21.4	7.1	62.2	71.4	64.3	26.3	7.1	28.6	0.0	0.0	0.0
Ithaca NY MSA AA	2	45	0.7	43	0.0	0.0	0.0	11.3	0.0	23.3	75.7	100.0	69.8	13.0	0.0	7.0	0.0	0.0	0.0
Kingston NY MSA	8	287	2.9	34	0.2	0.0	0.0	4.8	0.0	0.0	53.4	50.0	55.9	41.6	50.0	44.1	0.0	0.0	0.0
NY Non MSA AA	83	2,535	30.3	998	0.2	0.0	0.4	4.5	7.2	5.5	80.5	68.7	84.3	14.9	24.1	9.8	0.0	0.0	0.0
NYC JC WP NYNJ MMA	13	589	4.7	198	1.8	0.0	2.5	9.2	0.0	2.5	13.2	0.0	10.1	75.1	100.0	84.8	0.6	0.0	0.0
Rochester MSA AA	34	1,278	12.4	513	1.6	0.0	0.4	8.1	17.6	10.1	66.2	73.5	81.1	24.1	8.8	8.4	0.0	0.0	0.0
Syracuse NY MSA AA	41	791	17.2	148	1.7	0.0	0.7	12.2	4.9	10.1	53.7	46.3	70.3	31.8	43.9	18.2	0.6	4.9	0.7
Utica NY MSA AA	3	20	2.1	70	2.0	0.0	0.0	2.2	0.0	1.4	62.1	33.3	75.7	33.6	66.7	22.9	0.0	0.0	0.0
Watertown NY MSA	8	331	4.1	58	0.0	0.0	0.0	4.2	0.0	0.0	82.6	62.5	93.1	13.2	37.5	6.9	0.0	0.0	0.0
Total	274	8,352	100.0	2,505	1.4	0.0	0.6	7.7	7.3	7.2	55.5	57.7	73.1	35.2	34.3	19.1	0.3	0.7	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Albany Schenectady CSA AA	23	718	9.6	135	96.7	95.7	50.4	2.1	11.1	1.2	0.0
KeyBank 2018 Binghamton NY MSA AA	0	0	0.0	60	97.1	0.0	55.0	1.9	0.0	1.0	0.0
KeyBank 2018 Buffalo NY MSA AA	45	1,446	16.4	192	95.0	73.3	37.0	3.4	20.0	1.6	6.7
KeyBank 2018 Dutchess Putnam NY MSA AA	14	312	5.1	56	96.4	100.0	55.4	2.5	0.0	1.1	0.0
KeyBank 2018 Ithaca NY MSA AA	2	45	0.8	43	96.2	100.0	51.2	2.4	100.0	1.4	0.0
KeyBank 2018 Kingston NY MSA AA	8	287	2.9	34	95.6	87.5	55.9	3.0	50.0	1.4	0.0
KeyBank 2018 NY Non MSA AA	83	2,535	33.6	998	95.7	66.3	49.7	3.5	25.3	0.7	8.4
KeyBank 2018 NYC JC WP NY NJ MMA AA	13	589	5.5	198	94.4	84.6	39.4	3.4	15.4	2.2	0.0
KeyBank 2018 Rochester MSA AA	34	1,278	12.4	513	94.0	67.6	50.5	4.3	23.5	1.7	8.8
KeyBank 2018 Syracuse NY MSA AA	41	791	15.0	148	95.5	78.0	48.0	3.0	22.0	1.5	0.0
KeyBank 2018 Utica NY MSA AA	3	20	2.1	70	96.9	0.0	57.1	1.0	0.0	2.0	100.0
KeyBank 2018 Watertown NY MSA AA	8	331	4.1	58	96.4	87.5	27.6	2.4	16.7	1.2	0.0
Total	274	8,352	100.0	2,505	95.4	74.8	48.1	3.2	19.3	1.5	5.8
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e
KeyBank 2018 Cleveland OH CSA	5,455	619,299	63.7	100,708	5.9	3.0	2.8	15.5	11.7	12.0	43.6	38.0	44.5	34.8	47.2	40.7	0.1	0.1	0.0
KeyBank 2018 Columbus OH MSA	932	485,167	10.9	58,814	5.9	6.4	5.1	18.2	16.3	16.7	31.1	29.4	30.4	44.7	47.9	47.8	0.0	0.0	0.0
KeyBank 2018Dayto n OH CSA AA	429	62,793	5.0	23,486	6.1	3.7	3.2	17.3	19.3	15.0	44.5	46.2	45.7	32.2	30.8	36.1	0.0	0.0	0.0
KeyBank 2018 Mansfield OH MSA	128	9,093	1.5	2,981	2.2	0.0	0.7	13.6	10.2	9.1	57.9	58.6	59.7	26.3	31.3	30.5	0.0	0.0	0.0
KeyBank 2018 OH Non MSA	628	57,789	7.3	13,577	0.0	0.0	0.0	11.4	12.9	11.0	62.8	60.2	60.0	25.8	26.9	29.0	0.0	0.0	0.0
KeyBank 2018 Toledo OH MSA	988	118,905	11.5	15,300	6.8	2.2	2.3	12.0	9.1	8.6	45.0	38.8	44.6	36.2	49.9	44.6	0.0	0.0	0.0
Total	8,560	1,353,047	100.0	214,866	5.4	3.1	3.2	15.6	12.3	13.3	43.4	39.5	42.0	35.6	45.1	41.5	0.1	0.1	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Cleveland OH CSA	5,455	619,299	63.7	100,708	22.0	8.4	9.5	17.0	18.3	19.9	20.0	21.1	21.6	41.0	45.8	36.0	0.0	6.4	12.9
KeyBank 2018 Columbus OH MSA	932	485,167	10.9	58,814	22.2	11.4	7.3	16.7	20.4	17.8	18.8	20.5	20.5	42.4	43.3	39.6	0.0	4.4	14.8
KeyBank 2018 Dayton OH CSA AA	429	62,793	5.0	23,486	22.8	11.4	8.5	16.9	29.4	20.3	19.5	18.6	22.3	40.8	38.0	37.0	0.0	2.6	11.9
KeyBank 2018 Mansfield OH MSA	128	9,093	1.5	2,981	20.6	11.7	9.4	18.5	25.8	20.6	20.9	25.0	25.4	40.0	34.4	31.0	0.0	3.1	13.8
KeyBank 2018 OH Non MSA	628	57,789	7.3	13,577	18.5	8.6	7.7	18.0	20.9	21.9	21.9	24.0	23.0	41.6	45.2	35.7	0.0	1.3	11.7
KeyBank 2018 Toledo OH MSA AA	988	118,905	11.5	15,300	23.2	8.8	9.5	16.4	24.2	20.5	19.7	25.2	23.0	40.7	39.0	35.5	0.0	2.8	11.5
Total	8,560	1,353,047	100.0	214,866	21.9	9.0	8.7	17.0	20.1	19.5	19.8	21.6	21.6	41.3	44.2	37.0	0.0	5.1	13.2

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Cleveland OH CSA AA	3,080	290,244	63.7	57,481	8.3	8.4	7.2	14.9	13.0	13.9	37.5	35.4	36.2	38.5	42.1	42.0	0.8	1.0	0.7
KeyBank 2018 Columbus OH MSA	665	59,880	13.8	31,301	10.4	9.2	15.2	16.9	16.7	14.3	26.9	27.1	23.6	45.2	46.5	46.5	0.6	0.6	0.4
KeyBank 2018 Dayton OH CSA	377	45,757	7.8	11,427	7.8	7.4	7.6	19.5	20.4	19.4	40.6	41.1	39.8	32.1	31.0	33.1	0.0	0.0	0.0
KeyBank 2018 Mansfield OH MSA	63	4,132	1.3	1,619	9.4	14.3	9.0	15.1	25.4	15.3	48.5	38.1	49.6	27.1	22.2	26.1	0.0	0.0	0.0
KeyBank 2018 OH Non MSA	289	15,939	6.0	6,886	0.0	0.0	0.0	15.8	17.3	13.7	59.8	60.9	59.6	24.4	21.8	26.7	0.0	0.0	0.0
KeyBank 2018 Toledo OH MSA	361	27,049	7.5	7,642	12.5	8.9	10.1	10.3	17.2	9.7	38.8	31.0	36.7	38.3	42.9	43.5	0.1	0.0	0.0
Total	4,835	443,001	100.0	116,356	8.6	8.1	9.2	15.6	14.8	14.3	36.9	35.9	34.8	38.4	40.5	41.3	0.6	0.7	0.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Cleveland OH CSA AA	3,080	290,244	63.7	57,481	81.4	68.6	46.7	7.3	29.6	11.3	1.8
KeyBank 2018 Columbus OH MSA AA	665	59,880	13.8	31,301	82.4	66.0	41.7	6.0	32.8	11.6	1.2
KeyBank 2018 Dayton OH CSA AA	377	45,757	7.8	11,427	79.2	60.7	45.3	6.9	35.5	13.8	3.7
KeyBank 2018 Mansfield OH MSA AA	63	4,132	1.3	1,619	77.1	71.4	47.2	6.5	28.6	16.3	0.0
KeyBank 2018 OH Non-MSA AA	289	15,939	6.2	6,886	77.9	76.5	47.2	6.7	22.5	15.4	1.9
KeyBank 2018 Toledo OH MSA AA	361	27,049	7.8	7,642	78.1	72.3	46.3	7.8	27.4	14.1	0.5
Total	4,835	443,001	100.0	116,356	80.9	68.4	45.2	6.9	29.9	12.2	1.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Cleveland OH CSA AA	35	696	55.9	439	3.4	0.0	1.8	9.5	14.3	3.9	50.1	54.3	63.8	36.9	31.4	30.5	0.1	0.0	0.0
KeyBank 2018 Columbus OH MSA AA	3	35	9.1	209	6.1	0.0	1.9	15.3	66.7	13.4	35.6	33.3	41.1	42.9	0.0	42.6	0.1	0.0	1.0
KeyBank 2018 Dayton OH CSA AA	6	170	9.0	245	3.7	0.0	0.4	13.6	0.0	5.3	48.0	83.3	54.7	34.6	16.7	39.6	0.0	0.0	0.0
KeyBank 2018 Mansfield OH MSA AA	1	25	2.9	73	0.9	0.0	2.7	5.2	0.0	0.0	65.0	100.0	78.1	28.9	0.0	19.2	0.0	0.0	0.0
KeyBank 2018 OH Non MSA	18	611	26.9	550	0.0	0.0	0.0	6.5	11.1	3.6	60.6	61.1	70.7	32.9	27.8	25.6	0.0	0.0	0.0
KeyBank 2018 Toledo OH MSA AA	4	47	9.1	405	2.6	0.0	0.2	5.5	0.0	1.5	51.5	25.0	73.3	40.5	75.0	24.9	0.0	0.0	0.0
Total	67	1,584	100.0	1,921	3.3	0.0	0.8	10.1	13.4	4.4	49.3	56.7	64.7	37.2	29.9	30.0	0.1	0.0	0.1
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Cleveland OH CSA AA	35	696	55.9	439	95.7	97.1	67.4	2.5	5.3	1.7	0.0
KeyBank 2018 Columbus OH M SA AA	3	35	9.1	209	94.4	100.0	49.8	3.3	0.0	2.3	0.0
KeyBank 2018 Dayton OH CSA AA	6	170	12.1	245	95.8	83.3	57.1	2.8	25.0	1.4	0.0
KeyBank 2018 Mansfield OH MSA AA	1	25	2.9	73	97.7	100.0	54.8	1.2	0.0	1.2	0.0
KeyBank 2018 OH Non MSA AA	18	611	26.9	550	96.9	88.9	63.1	1.6	28.6	1.5	0.0
KeyBank 2018 Toledo OH MSA AA	4	47	6.0	405	95.1	100.0	77.0	3.3	0.0	1.6	0.0
Total	67	1,584	100.0	1,921	95.7	94.0	64.5	2.6	6.0	1.7	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
KeyBank 2018Eugene OR MSA	322	45,639	46.9	12,553	0.9	0.6	1.1	16.9	11.5	18.0	57.2	58.1	57.9	25.0	29.8	23.0	0.0	0.0	0.0	
KeyBank 2018 Grants Pass OR MSA AA	55	5,092	8.0	2,834	0.0	0.0	0.0	6.9	10.9	12.1	66.2	54.5	61.6	26.9	34.5	26.3	0.0	0.0	0.0	
KeyBank 2018Medford OR MSA AA	197	30,450	28.7	7,483	0.2	0.5	0.5	12.2	10.7	11.7	59.0	50.3	57.4	28.6	38.6	30.4	0.0	0.0	0.0	
KeyBank 2018 OR Non MSA AA	112	19,665	16.3	783	0.0	0.0	0.0	0.0	0.0	0.0	19.7	33.9	28.9	80.3	66.1	71.1	0.0	0.0	0.0	
Total	686	100,846	100.0	23,653	0.5	0.4	0.8	13.5	9.3	14.7	57.8	51.6	57.2	28.1	38.6	27.3	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018Eugene OR MSA	322	45,639	46.9	12,553	21.4	4.0	4.4	17.8	14.9	15.2	20.5	23.9	23.5	40.3	53.7	45.4	0.0	3.4	11.5
KeyBank 2018 Grants Pass OR MSA AA	55	5,092	10.7	2,834	19.4	5.5	3.6	19.5	14.5	12.3	19.7	18.2	23.5	41.4	60.0	47.4	0.0	1.8	13.1
KeyBank 2018Medford OR MSA AA	197	30,450	28.7	7,483	21.2	4.1	3.0	18.2	14.2	12.9	19.6	18.3	22.7	41.1	59.9	49.5	0.0	3.6	11.9
KeyBank 2018 OR Non MSA AA	112	19,665	16.3	783	11.8	2.7	1.3	11.8	7.1	5.1	21.6	8.9	15.3	54.8	75.0	66.3	0.0	6.3	12.0
Total	686	100,846	100.0	23,653	20.8	3.9	3.8	18.0	13.4	13.8	20.1	19.4	22.9	41.2	59.5	47.6	0.0	3.8	11.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Eugene OR MSA	130	8,714	41.1	6,623	5.7	3.1	5.7	24.1	25.4	24.9	47.6	46.2	46.7	22.6	25.4	22.8	0.0	0.0	0.0
KeyBank 2018 Grants Pass OR MSA AA	18	1,377	5.7	1,262	0.0	0.0	0.0	21.3	27.8	21.2	60.9	50.0	57.9	17.8	22.2	20.9	0.0	0.0	0.0
KeyBank 2018 Medford OR MSA	125	8,101	39.6	4,548	5.8	6.4	5.2	15.0	13.6	12.5	54.3	52.0	55.8	24.8	28.0	26.5	0.0	0.0	0.0
KeyBank 2018 OR Non MSA	43	1,562	13.6	651	0.0	0.0	0.0	0.0	0.0	0.0	46.2	39.5	46.9	53.8	60.5	53.1	0.0	0.0	0.0
Total	316	19,754	100.0	13,084	4.8	3.8	4.7	19.5	17.4	19.0	51.5	47.8	51.0	24.2	31.0	25.4	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Eugene OR MSA AA	130	8,714	42.2	6,623	85.7	73.1	49.6	5.1	26.2	9.2	1.5
KeyBank 2018 Grants Pass OR MSA AA	18	1,377	6.5	1,262	88.5	94.4	51.8	3.6	10.0	7.9	0.0
KeyBank 2018 Medford OR MSA AA	125	8,101	39.6	4,548	87.5	70.4	47.1	4.1	28.8	8.4	1.6
KeyBank 2018 OR Non MSA AA	43	1,562	13.6	651	88.5	83.7	55.1	4.4	16.3	7.1	0.0
Total	316	19,754	100.0	13,084	86.8	74.7	49.2	4.5	24.7	8.7	0.6
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Eugene OR MSA AA	17	984	68.0	146	1.5	0.0	1.4	14.1	0.0	14.4	53.4	76.5	49.3	31.0	23.5	34.9	0.0	0.0	0.0
KeyBank 2018 Grants Pass OR MSA AA	0	0	0.0	29	0.0	0.0	0.0	5.1	0.0	0.0	67.2	0.0	72.4	27.7	0.0	27.6	0.0	0.0	0.0
KeyBank 2018Medford OR MSA AA	3	72	12.0	145	2.1	0.0	2.1	10.0	0.0	9.0	64.5	100.0	68.3	23.4	0.0	20.7	0.0	0.0	0.0
KeyBank 2018 OR Non MSA AA	5	140	20.0	67	0.0	0.0	0.0	0.0	0.0	0.0	6.4	0.0	3.0	93.6	100.0	97.0	0.0	0.0	0.0
Total	25	1,196	100.0	387	1.4	0.0	1.3	10.0	0.0	8.8	54.3	64.0	50.1	34.3	36.0	39.8	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Eugene OR MSA AA	17	984	71.4	146	96.0	58.8	56.2	2.8	41.2	1.3	0.0
KeyBank 2018 Grants Pass OR MSA AA	0	0	0.0	29	95.2	0.0	58.6	2.2	0.0	2.7	0.0
KeyBank 2018 Medford OR MSA AA	3	72	12.0	145	96.7	100.0	52.4	2.2	0.0	1.1	0.0
KeyBank 2018 OR Non-MSA AA	5	140	20.0	67	91.8	60.0	61.2	5.7	40.0	2.5	0.0
Total	25	1,196	100.0	387	95.7	64.0	55.8	2.8	36.0	1.5	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner-Occupie d Housing Units	% Bank Loan s	Aggregat e
Allentwn Beth Easton PA MMA	291	27,031	8.6	21,280	3.5	2.4	4.4	14.9	5.8	17.0	46.5	56.4	44.2	35.1	35.4	34.4	0.0	0.0	0.0
EStroudsbur g PA MSA	31	2,561	0.9	5,042	0.0	0.0	0.0	8.0	0.0	8.6	86.4	96.8	87.0	5.6	3.2	4.3	0.0	0.0	0.0
Erie MSA	151	21,481	4.5	5,953	4.5	0.7	2.3	8.8	10.6	8.5	50.6	41.1	47.2	36.2	47.7	42.1	0.0	0.0	0.0
Mont Bucks Ches PA MSA	1,097	201,123	32.4	67,483	1.6	0.8	1.8	16.4	14.3	16.7	49.9	61.3	49.6	32.2	23.5	31.9	0.0	0.1	0.0
PA Non MSA	87	6,647	2.6	2,495	1.4	2.3	1.5	2.6	0.0	2.8	91.5	89.7	89.4	4.5	8.0	6.3	0.0	0.0	0.0
Phila PA MSA	70	10,190	2.1	36,619	10.0	5.7	6.0	32.1	18.6	29.8	28.3	25.7	28.9	29.6	50.0	35.2	0.0	0.0	0.1
Pittsburgh PA MSA	1,552	149,292	45.8	64,441	2.9	2.4	1.6	16.9	14.2	13.2	49.2	49.9	46.6	31.0	33.6	38.6	0.0	0.0	0.0
2018Reading PA MSA	109	81,795	3.2	11,504	7.1	0.0	5.6	4.1	1.8	4.5	61.1	76.1	61.4	27.7	22.0	28.5	0.0	0.0	0.0
Total	3,388	500,120	100.0	214,817	3.9	1.8	2.9	17.4	12.5	16.7	48.2	55.5	46.5	30.4	30.1	33.9	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Allentwn Beth Easton PA MMA	291	27,031	8.6	21,280	21.3	15.1	8.7	18.5	18.9	19.7	21.4	30.6	22.1	38.8	32.0	33.2	0.0	3.4	16.3
E Stroudsburg PA MSA	31	2,561	0.9	5,042	20.7	0.0	6.9	18.1	45.2	18.5	21.3	16.1	23.0	39.9	38.7	33.2	0.0	0.0	18.3
Erie MSA AA	151	21,481	4.5	5,953	21.1	4.0	9.0	17.6	23.2	19.7	20.8	28.5	25.1	40.5	38.4	36.8	0.0	6.0	9.4
Mont Bucks Ches PA MSA AA	1,097	201,123	32.4	67,483	20.0	16.4	9.9	18.3	24.3	21.3	22.0	24.4	23.1	39.7	33.0	34.2	0.0	1.8	11.5
PA Non MSA	87	6,647	2.6	2,495	19.7	10.3	8.9	19.0	26.4	20.2	21.8	31.0	23.6	39.5	32.2	37.0	0.0	0.0	10.4
Phila PA MSA	70	10,190	2.8	36,619	30.6	2.9	7.8	17.8	10.0	15.1	16.5	25.7	19.6	35.1	57.1	41.2	0.0	4.3	16.4
Pittsburgh PA MSA	1,552	149,292	45.8	64,441	21.0	14.4	9.2	17.1	24.2	19.5	20.4	23.0	21.6	41.6	35.2	39.4	0.0	3.1	10.4
Reading PA MSA AA	109	81,795	11.9	11,504	21.4	4.6	8.2	17.2	19.3	22.1	21.4	29.4	22.7	40.1	44.0	32.3	0.0	2.8	14.7
Total	3,388	500,120	100.0	214,817	22.4	13.9	9.0	17.8	23.6	19.4	20.4	24.8	22.0	39.4	35.1	36.8	0.0	2.7	12.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentwn Beth Easton PA MMSA	276	12,605	6.5	13,307	7.0	3.6	6.2	17.1	9.8	16.9	42.0	60.5	41.3	34.0	26.1	35.6	0.0	0.0	0.0
E Stroudsbrg PA MSA	15	1,054	0.7	2,979	0.0	0.0	0.0	20.8	0.0	16.0	74.2	93.3	77.0	5.0	6.7	7.0	0.0	0.0	0.0
Erie MSA AA	318	25,508	7.4	3,671	13.0	11.3	12.0	11.9	12.0	11.2	45.3	45.9	46.7	29.8	30.8	30.1	0.0	0.0	0.0
Mont Bucks Ches PA MSA	1,200	85,098	28.1	54,825	2.5	2.3	2.1	14.9	14.9	15.0	48.3	57.2	48.5	34.2	25.7	34.4	0.1	0.0	0.0
PA Non MSA AA	112	6,640	5.4	1,615	8.9	0.0	6.9	5.4	0.0	4.0	82.4	95.5	85.3	3.3	4.5	3.8	0.0	0.0	0.0
Phila PA MSA AA	198	12,348	4.6	23,593	8.6	11.6	8.7	26.3	34.8	23.9	21.3	12.6	20.7	41.6	40.9	44.9	2.2	0.0	1.8
Pgh PA MSA AA	2,056	151,841	48.2	40,376	5.2	5.1	4.5	14.9	13.9	15.6	41.1	45.7	41.3	37.9	34.6	38.1	0.9	0.7	0.5
Reading PA MSA	94	2,997	4.5	6,603	10.2	1.1	7.6	5.2	1.1	4.0	58.3	73.4	59.5	26.2	24.5	28.9	0.0	0.0	0.0
Total	4,269	298,091	100.0	146,969	5.5	4.7	4.7	16.6	14.1	16.1	42.1	50.5	42.9	35.2	30.4	35.9	0.7	0.3	0.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Allentwn Beth Easton PA MMSA AA	276	12,605	6.5	13,307	83.6	71.7	47.6	5.6	15.9	10.8	12.3
KeyBank 2018 E Stroudsburg PA MSA AA	15	1,054	0.5	2,979	86.1	53.3	45.7	4.3	20.0	9.6	36.4
KeyBank 2018 Erie MSA	318	25,508	7.4	3,671	78.4	48.4	41.8	7.9	22.6	13.7	28.9
KeyBank 2018 Mont Bucks Ches PA MSA AA	1,200	85,098	28.1	54,825	85.6	64.9	45.4	6.4	24.5	8.0	10.6
KeyBank 2018 PA Non MSA AA	112	6,640	2.6	1,615	79.0	60.7	48.4	6.7	6.3	14.4	33.0
KeyBank 2018 Phila PA MSA AA	198	12,348	4.6	23,593	86.6	73.7	44.8	5.0	21.7	8.5	4.5
KeyBank 2018 Pittsburgh PA MSA AA	2,056	151,841	48.2	40,376	81.4	45.9	46.5	6.7	21.3	11.9	32.8
KeyBank 2018 Reading PA MSA AA	94	2,997	2.8	6,603	83.0	73.4	47.9	6.5	8.5	10.4	18.1
Total	4,269	298,091	100.0	146,969	84.0	55.4	45.8	6.2	21.3	9.8	23.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Allentwn Beth Easton PA MMSA	2	50	10.5	100	2.2	0.0	1.0	8.3	0.0	7.0	50.3	100.0	57.0	39.1	0.0	35.0	0.0	0.0	0.0
E Stroudsburg PA MSA	1	10	5.3	18	0.0	0.0	0.0	5.4	0.0	0.0	84.6	100.0	72.2	10.0	0.0	27.8	0.0	0.0	0.0
Erie MSA	6	163	11.1	34	2.7	0.0	0.0	6.9	0.0	5.9	47.8	50.0	47.1	42.7	50.0	47.1	0.0	0.0	0.0
Mont Bucks Chester PA MSA AA	15	333	28.6	472	1.4	0.0	0.4	15.5	0.0	31.1	53.4	73.3	51.3	29.8	26.7	17.2	0.0	0.0	0.0
PA Non MSA AA	7	155	13.0	83	1.3	0.0	1.2	1.3	0.0	0.0	96.9	100.0	98.8	0.5	0.0	0.0	0.0	0.0	0.0
Phila PA MSA AA	0	0	0.0	3	6.5	0.0	33.3	21.1	0.0	0.0	24.4	0.0	33.3	46.0	0.0	33.3	2.1	0.0	0.0
Pittsburgh PA MSA	23	841	42.9	187	2.1	0.0	1.1	13.0	13.0	12.8	55.7	69.6	72.7	29.1	13.0	13.4	0.1	4.3	0.0
Reading PA MSA AA	0	0	0.0	323	1.2	0.0	0.0	0.6	0.0	0.3	70.4	0.0	87.9	27.9	0.0	11.8	0.0	0.0	0.0
Total	54	1,552	100.0	1,220	1.9	0.0	0.6	12.0	5.6	14.8	55.6	74.1	68.1	30.3	18.5	16.5	0.1	1.9	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Allentown Beth Easton PA MMSA AA	2	50	10.5	100	95.9	100.0	56.0	2.2	0.0	1.9	0.0
KeyBank 2018 E Stroudsburg PA MSA AA	1	10	5.3	18	97.9	100.0	61.1	0.8	0.0	1.3	0.0
KeyBank 2018 Erie MSA	6	163	11.4	34	95.3	50.0	32.4	3.3	50.0	1.3	50.0
KeyBank 2018 Mont Bucks Ches PA MSA AA	15	333	28.6	472	94.2	46.7	62.3	4.0	46.7	1.8	10.0
KeyBank 2018 PA Non MSA AA	7	155	13.0	83	96.7	100.0	43.4	2.6	0.0	0.8	0.0
KeyBank 2018 Phila PA MSA AA	0	0	0.0	3	94.0	0.0	33.3	2.8	0.0	3.2	0.0
KeyBank 2018 Pittsburgh PA MSA AA	23	841	42.9	187	95.9	78.3	41.7	2.5	21.7	1.7	0.0
KeyBank 2018 Reading PA MSA AA	0	0	0.0	323	95.7	0.0	67.2	2.9	0.0	1.5	0.0
Total	54	1,552	100.0	1,220	95.2	70.4	57.7	3.1	25.9	1.7	3.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Logan UT MSA	47	4,849	2.9	4,753	1.5	0.0	1.8	12.7	19.1	13.4	47.3	40.4	46.1	38.6	40.4	38.7	0.0	0.0	0.0
KeyBank 2018 Salt Lake UT CSA AA	1,501	467,520	92.3	121,387	1.3	0.7	1.3	16.2	11.0	15.2	48.6	41.8	52.1	33.6	46.3	31.2	0.2	0.1	0.2
KeyBank 2018 UT Non MSA	78	32,737	4.8	2,581	0.0	0.0	0.0	0.0	0.0	0.0	30.7	35.9	26.7	68.9	64.1	71.8	0.5	0.0	1.5
Total	1,626	505,107	100.0	128,721	1.2	0.7	1.2	15.8	10.7	14.8	48.2	41.5	51.4	34.5	47.0	32.3	0.2	0.1	0.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Logan UT MSA	47	4,849	3.9	4,753	19.4	2.1	4.2	18.5	12.8	18.3	22.5	34.0	26.2	39.5	48.9	36.1	0.0	2.1	15.2
KeyBank 2018 Salt Lake UT CSA AA	1,501	467,520	92.3	121,387	19.1	3.2	5.9	18.2	12.7	21.4	22.8	20.4	26.8	39.9	59.9	33.2	0.0	3.8	12.6
KeyBank 2018 UT Non MSA	78	32,737	6.4	2,581	10.9	5.1	1.6	9.2	7.7	5.7	15.8	6.4	10.3	64.0	78.2	72.5	0.0	2.6	9.9
Total	1,626	505,107	100.0	128,721	18.9	3.3	5.8	18.1	12.5	21.0	22.6	20.1	26.5	40.3	60.5	34.1	0.0	3.7	12.6
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Logan UT MSA AA	35	6,846	6.5	2,126	6.8	2.9	4.8	21.6	14.3	19.3	39.2	65.7	41.5	32.4	17.1	34.4	0.0	0.0	0.0
KeyBank 2018 Salt Lake UT CSA AA	927	145,549	92.9	50,495	4.0	4.3	3.7	18.5	24.4	18.2	42.5	42.9	43.3	34.6	26.9	34.4	0.5	1.5	0.5
KeyBank 2018 UT Non MSA	36	2,235	3.6	2,207	0.0	0.0	0.0	0.0	0.0	0.0	18.4	55.6	22.2	81.5	44.4	77.7	0.1	0.0	0.1
Total	998	154,630	100.0	54,828	3.9	4.1	3.6	18.0	23.1	17.5	41.5	44.2	42.3	36.1	27.2	36.1	0.4	1.4	0.5
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Logan UT MSA AA	35	6,846	5.2	2,126	84.8	28.6	44.3	4.5	68.6	10.8	3.6
KeyBank 2018 Salt Lake UT CSA AA	927	145,549	92.9	50,495	86.9	54.5	43.7	4.7	42.8	8.4	2.7
KeyBank 2018 UT Non-MSA AA	36	2,235	4.4	2,207	88.9	77.8	49.4	4.1	19.4	7.1	4.2
Total	998	154,630	100.0	54,828	86.8	54.4	44.0	4.7	42.9	8.5	2.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Logan UT MSA	0	0	0.0	120	1.0	0.0	0.8	7.3	0.0	4.2	61.7	0.0	85.0	29.9	0.0	10.0	0.0	0.0	0.0
KeyBank 2018 Salt Lake UT CSA AA	11	592	55.0	327	2.1	0.0	0.0	15.4	0.0	9.8	50.0	72.7	69.1	32.4	27.3	21.1	0.2	0.0	0.0
KeyBank 2018 UT Non MSA AA	9	1,845	45.0	29	0.0	0.0	0.0	0.0	0.0	0.0	52.5	100.0	69.0	47.5	0.0	31.0	0.0	0.0	0.0
Total	20	2,437	100.0	476	1.9	0.0	0.2	13.9	0.0	7.8	51.2	85.0	73.1	32.8	15.0	18.9	0.1	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Logan UT MSA AA	0	0	0.0	120	96.6	0.0	28.3	2.6	0.0	0.8	0.0
KeyBank 2018 Salt Lake UT CSA AA	11	592	77.8	327	96.1	63.6	59.0	2.5	27.3	1.4	25.0
KeyBank 2018 UT Non-MSA AA	9	1,845	63.6	29	97.0	100.0	44.8	2.0	0.0	1.0	0.0
Total	20	2,437	100.0	476	96.2	80.0	50.4	2.5	15.0	1.3	9.1
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Burlington VT MSA	219	34,682	73.0	6,337	1.0	2.7	1.2	11.7	7.3	13.3	66.2	72.6	66.1	21.1	17.4	19.3	0.0	0.0	0.0
KeyBank 2018 VT Non MSA	81	9,043	27.0	4,615	0.0	0.0	0.0	5.1	6.2	3.4	75.7	80.2	73.6	19.2	13.6	23.0	0.0	0.0	0.0
Total	300	43,724	100.0	10,952	0.5	2.0	0.7	8.3	7.0	9.1	71.1	74.7	69.3	20.1	16.3	20.9	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Burlington VT MSA	219	34,682	95.6	6,337	20.6	11.9	9.9	17.6	22.8	23.2	23.0	22.4	25.4	38.8	42.5	30.8	0.0	0.5	10.7
KeyBank 2018 VT Non MSA	81	9,043	114.1	4,615	17.8	13.6	6.4	17.6	21.0	18.3	22.5	14.8	22.5	42.2	49.4	41.5	0.0	1.2	11.3
Total	300	43,724	100.0	10,952	19.2	12.3	8.4	17.6	22.3	21.1	22.7	20.3	24.2	40.5	44.3	35.3	0.0	0.7	11.0
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Burlington VT MSA AA	223	21,672	75.9	4,733	0.9	0.0	1.1	22.8	19.3	20.7	53.7	56.1	54.5	22.3	24.7	23.5	0.2	0.0	0.3
KeyBank 2018 VT Non MSA AA	71	3,773	49.0	4,037	0.0	0.0	0.0	8.0	4.2	5.4	74.4	71.8	70.8	17.6	23.9	23.8	0.0	0.0	0.0
Total	294	25,445	100.0	8,770	0.4	0.0	0.6	15.4	15.6	13.7	64.1	59.9	62.0	19.9	24.5	23.6	0.1	0.0	0.1
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Burlington VT MSA AA	223	21,672	75.9	4,733	83.2	60.1	39.3	6.4	39.5	10.4	1.0
KeyBank 2018 VT Non MSA AA	71	3,773	24.2	4,037	82.1	85.9	42.0	6.0	14.1	11.9	0.0
Total	294	25,445	100.0	8,770	82.7	66.3	40.6	6.2	33.3	11.1	0.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Burlington VT MSA AA	3	187	42.9	60	0.1	0.0	0.0	10.6	33.3	15.0	68.6	66.7	60.0	20.7	0.0	25.0	0.0	0.0	0.0
KeyBank 2018 VT Non MSA AA	4	487	60.0	87	0.0	0.0	0.0	2.2	0.0	0.0	76.0	25.0	72.4	21.8	75.0	27.6	0.0	0.0	0.0
Total	7	674	100.0	147	0.1	0.0	0.0	5.8	14.3	6.1	72.9	42.9	67.3	21.3	42.9	26.5	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Burlington VT MSA AA	3	187	42.9	60	97.1	100.0	38.3	1.4	0.0	1.5	0.0
KeyBank 2018 VT Non MSA AA	4	487	60.0	87	96.4	100.0	52.9	2.7	0.0	0.8	0.0
Total	7	674	100.0	147	96.7	100.0	46.9	2.2	0.0	1.1	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KeyBank 2018 Bellingham WA MSA	184	28,411	3.1	6,970	1.0	0.0	1.3	4.1	3.3	4.4	77.8	71.7	80.7	17.0	25.0	13.4	0.1	0.0	0.1
KeyBank 2018 Kenne Rich WA MSA AA	127	68,133	2.2	7,635	1.7	0.0	1.9	20.1	15.7	19.7	28.8	26.0	22.2	49.5	58.3	56.2	0.0	0.0	0.0
KeyBank 2018 Seattle WA CSA	4,560	1,434,642	78.0	186,890	2.3	2.0	2.5	17.4	17.0	18.6	48.0	48.2	48.9	32.2	32.9	30.0	0.0	0.0	0.0
KeyBank 2018 Spokane Valley WA MSA AA	52	5,504	0.9	1,493	0.0	0.0	0.0	47.3	42.3	41.5	52.7	57.7	58.5	0.0	0.0	0.0	0.0	0.0	0.0
KeyBank 2018 WA Non MSA	629	81,798	10.8	19,257	0.3	0.2	0.4	9.5	10.0	9.7	68.5	75.4	66.0	21.7	14.5	23.9	0.0	0.0	0.0
KeyBank 2018 Wenatchee WA MSA	26	38,430	0.4	2,585	0.0	0.0	0.0	5.0	3.8	6.2	80.4	88.5	80.5	14.6	7.7	13.4	0.0	0.0	0.0
KeyBank 2018Yakima WA MSA	269	31,958	4.6	5,313	0.0	0.0	0.0	17.6	16.0	12.1	41.2	45.0	39.9	41.3	39.0	48.0	0.0	0.0	0.0
Total	5,847	1,688,876	100.0	230,143	1.9	1.6	2.1	16.3	15.9	17.3	50.8	51.5	50.6	30.9	31.1	29.9	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KeyBank 2018 Bellingham WA MSA	184	28,411	10.5	6,970	20.8	4.9	4.6	17.1	9.8	15.7	22.5	23.9	25.8	39.6	59.8	44.2	0.0	1.6	9.6
KeyBank 2018 Kenne Rich WA MSA AA	127	68,133	3.1	7,635	20.3	2.4	5.6	16.9	11.0	17.4	18.2	20.5	24.0	44.6	63.0	41.3	0.0	3.2	11.7
KeyBank 2018Seattle WA CSA	4,560	1,434,642	78.0	186,890	21.0	5.8	4.5	17.7	15.9	15.4	21.0	23.1	24.8	40.3	52.1	43.5	0.0	3.1	11.8
KeyBank 2018 Spokane Valley WA MSA AA	52	5,504	3.0	1,493	26.6	3.8	7.0	21.0	19.2	15.0	23.0	46.2	23.2	29.4	28.8	40.5	0.0	1.9	14.3
KeyBank 2018 WA Non MSA	629	81,798	10.8	19,257	18.6	6.5	4.8	18.7	18.0	15.0	22.0	25.9	24.9	40.6	47.4	42.3	0.0	2.2	13.0
KeyBank 2018 Wenatchee WA MSA	26	38,430	0.6	2,585	18.5	0.0	3.2	18.1	3.8	11.3	21.8	19.2	21.1	41.6	69.2	54.1	0.0	7.7	10.4
KeyBank 2018 Yakima WA MSA	269	31,958	4.6	5,313	20.2	4.1	3.4	18.1	14.5	12.5	20.6	24.2	22.4	41.1	52.4	47.9	0.0	4.8	13.8
Total	5,847	1,688,876	100.0	230,143	20.7	5.6	4.5	17.8	15.7	15.3	21.1	23.6	24.7	40.4	52.0	43.6	0.0	3.0	11.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KeyBank 2018 Bellingham WA MSA	127	14,447	3.6	4,617	1.6	1.6	1.7	5.4	2.4	6.5	72.8	78.0	74.2	14.7	9.4	12.9	5.5	8.7	4.8
KeyBank 2018 Kenne Rich WA MSA AA	58	4,364	3.4	2,722	1.8	1.7	1.7	22.7	27.6	21.5	35.9	43.1	32.1	39.7	27.6	44.7	0.0	0.0	0.0
KeyBank 2018 Seattle WA CSA	2,914	295,371	82.9	98,280	5.3	6.9	5.1	19.7	21.6	18.1	40.9	44.6	41.1	33.7	26.7	35.2	0.4	0.2	0.4
KeyBank 2018 Spokane Valley WA MSA	30	2,499	0.9	632	0.0	0.0	0.0	50.0	56.7	44.3	50.0	43.3	55.7	0.0	0.0	0.0	0.0	0.0	0.0
KeyBank 2018 WA Non MSA	263	22,294	7.5	6,891	0.7	0.8	0.5	13.3	11.0	12.2	67.1	76.8	67.4	18.9	11.4	19.9	0.0	0.0	0.0
KeyBank 2018 Wenatchee WA MSA	22	4,156	1.3	1,619	0.0	0.0	0.0	18.3	9.1	14.1	70.4	86.4	74.9	11.3	4.5	11.1	0.0	0.0	0.0
KeyBank 2018 Yakima WA MSA	102	13,163	2.9	3,006	0.0	0.0	0.0	29.0	29.4	24.9	39.3	44.1	42.9	31.7	26.5	32.2	0.0	0.0	0.0
Total	3,516	356,294	100.0	117,767	4.4	5.9	4.4	19.0	20.6	17.7	44.7	48.4	44.3	31.3	24.6	33.1	0.5	0.5	0.5
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KeyBank 2018 Bellingham WA MSA AA	127	14,447	4.2	4,617	87.1	60.6	43.9	4.9	34.6	7.9	7.9
KeyBank 2018 Kenne Rich WA MSA AA	58	4,364	2.0	2,722	83.6	70.7	47.7	4.5	29.3	11.8	0.0
KeyBank 2018 Seattle WA CSA AA	2,914	295,371	82.9	98,280	86.0	66.0	45.2	4.9	32.4	9.1	1.6
KeyBank 2018 Spokane Valley WA MSA AA	30	2,499	0.9	632	85.6	86.7	49.7	3.7	30.8	10.6	0.0
KeyBank 2018 WA Non MSA AA	263	22,294	7.5	6,891	84.7	71.5	50.7	4.0	28.1	11.3	0.8
KeyBank 2018 Wenatchee WA MSA AA	22	4,156	0.6	1,619	83.3	63.6	46.9	5.3	36.4	11.4	0.0
KeyBank 2018 Yakima WA MSA AA	102	13,163	2.9	3,006	79.9	59.8	49.8	6.3	40.2	13.8	0.0
Total	3,516	356,294	100.0	117,767	85.7	66.3	45.7	4.9	32.2	9.4	1.5
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KeyBank 2018 Bellingham WA MSA	4	325	1.7	183	1.3	0.0	0.0	2.4	0.0	2.2	81.8	100.0	73.2	14.3	0.0	24.6	0.2	0.0	0.0
KeyBank 2018 Kenne Rich WA MSA AA	12	2,244	5.7	115	1.8	0.0	0.0	12.1	8.3	3.5	51.6	91.7	53.0	34.6	0.0	43.5	0.0	0.0	0.0
KeyBank 2018 Seattle WA CSA	57	4,281	28.6	533	3.2	1.8	0.8	16.8	10.5	12.6	47.9	63.2	53.5	32.1	24.6	33.2	0.1	0.0	0.0
KeyBank 2018 Spokane Valley WA MSA AA	2	65	1.9	53	0.0	0.0	0.0	46.1	50.0	49.1	53.9	50.0	50.9	0.0	0.0	0.0	0.0	0.0	0.0
KeyBank 2018 WA Non MSA	91	16,643	38.1	572	0.2	0.0	0.0	9.6	9.9	11.4	72.1	78.0	70.6	18.1	12.1	18.0	0.0	0.0	0.0
KeyBank 2018 Wenatchee WA MSA	7	1,731	2.9	80	0.0	0.0	0.0	6.1	0.0	1.3	80.6	71.4	95.0	13.3	28.6	3.8	0.0	0.0	0.0
KeyBank 2018 YakimaWA MSAAA	66	12,205	30.2	308	0.0	0.0	0.0	8.1	3.0	4.2	56.2	75.8	63.0	35.7	21.2	32.8	0.0	0.0	0.0
Total	239	37,494	100.0	1,844	2.0	0.4	0.2	13.7	8.0	9.8	57.1	74.5	64.0	27.2	17.2	26.0	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KeyBank 2018 Bellingham WA MSA AA	4	325	1.7	183	95.7	100.0	33.9	2.6	0.0	1.7	0.0
KeyBank 2018 Kenne Rich WA MSA AA	12	2,244	5.7	115	91.5	75.0	35.7	5.3	50.0	3.2	0.0
KeyBank 2018 Seattle WA CSA AA	57	4,281	28.6	533	95.1	71.9	48.0	3.0	28.1	1.9	0.0
KeyBank 2018 Spokane Valley WA MSA AA	2	65	1.9	53	98.5	100.0	64.2	0.4	0.0	1.1	0.0
KeyBank 2018 WA Non MSA AA	91	16,643	38.1	572	95.3	73.6	50.7	2.4	25.3	2.3	2.0
KeyBank 2018 Wenatchee WA MSA AA	7	1,731	3.8	80	92.5	75.0	70.0	4.6	42.9	2.8	33.3
KeyBank 2018 Yakima WA MSA AA	66	12,205	27.6	308	87.2	65.2	44.8	9.9	33.3	2.9	2.9
Total	239	37,494	100.0	1,844	94.4	70.7	47.6	3.5	28.0	2.1	2.3

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0