
Summary of Keycorp's policy concerning its continuous disclosure obligations

As a listed public company, Keycorp is obliged, under the Australian Stock Exchange (ASX) Listing Rules, to immediately notify the ASX of any information concerning Keycorp of which it is or becomes aware and which a reasonable person would expect to have a material effect on the price or value of Keycorp's shares.

This document summarises Keycorp's policy that is designed to achieve compliance with that Listing Rule.

Keycorp will become aware of information for the purpose of this ASX Listing Rule if a director or an "executive officer" of Keycorp has - or ought reasonably to have - come into possession of the information in the course of the performance of his/her duties as a director or executive officer. A person is an "executive officer" of Keycorp if he/she is concerned in or takes part in the management of Keycorp.

Once a Keycorp director or executive officer becomes aware of a significant event or development affecting the company which has not yet been notified to the market, he/she must immediately bring the issue to the attention of the Company Secretary who will review the information as to its potential impact on the share price and determine if it should be disclosed to the market. In the absence of the Company Secretary, the issue should be referred to the Chief Executive Officer.

All issues in connection with the disclosure of information to the ASX are to be dealt with by the Company Secretary or, in the Company Secretary's absence, the Chief Executive Officer.

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