

The 2013 KeyCorp Corporate Responsibility Report • GRI Index







On the cover: Milford Wind is a 306 MW wind farm located near the Town of Milford spanning Beaver and Millard Counties in Utah. The project was financed by KeyBank N.A. in 2009.

This GRI Content Index is a complement to KeyCorp's 2013 Corporate Responsibility (CR) Report and allows you to explore Key's CR approach and performance in greater depth. The listed topics follow the Global Reporting Initiative (GRI)'s suggested framework. In addition to directing you to specific pages within our report, the Index references publicly disclosed documents, which offer a more comprehensive view of our company. We thank you for your interest in Key's responsible approach to banking, citizenship, and operations, and we welcome your feedback.

To view the 2012 KeyBank Corporate Responsibility Report, click here.

Fully ■ Partially ■ Not



Standard disclosures part 1: **Profile disclosures**

Profile	Description	Danartad	Location in report
Disclosure	Description	Reported	Location in report
Strategy ar	nd analysis		
1.1	Statement from the most senior decision-maker of the organization.	•	Page 5*
1.2	Description of key impacts, risks, and opportunities.	•	Pages 18-28 in 2013 Form 10-K
Organizatio	nal profile		
2.1	Name of the organization.	•	KeyCorp
2.2	Primary brands, products, and/or services.	•	Page 4
	Operational structure of the		Page 4
2.3	organization, including main divisions, operating companies, subsidiaries, and joint ventures.	•	Pages 4-5 in 2013 10-K
2.4	Location of organization's headquarters.	•	Cleveland, OH
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	•	All major operations are located within the United States of America.
2.6	Nature of ownership and legal form.	•	KeyCorp was organized in 1958 under the laws of the state of Ohio. It is a publicly traded company, headquartered in Cleveland, OH.
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	•	Page 4
2.8	Scale of the reporting organization.	•	Page 4
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	•	There were no material changes to size, structure or ownership during the reporting period.
2.10	Awards received in the reporting period.	•	Page 17

Profile Disclosure	Description	Reported	Location in report
Report para	ameters		
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	•	This report covers the calendar year 2013.
3.2	Date of most recent previous report (if any).	•	Previous report covered calendar year 2012.
3.3	Reporting cycle (annual, biennial, etc.)	•	Annual
3.4	Contact point for questions regarding the report or its contents.	•	Page 3
3.5	Process for defining report content.	•	Page 2
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	•	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	•	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	•	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	•	Page 2

Fully ● Partially ● Not



Standard disclosures part 1: Profile disclosures

5 (1)			
Profile Disclosure	Description	Reported	Location in report
Report para	ameters (continued)		
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	•	None
3.12	Table identifying the location of the Standard Disclosures in the report.	•	Page 18
3.13	Policy and current practice with regard to seeking external assurance for the report.	•	The content of this report is reviewed internally instead of engaging an external auditor.
Governance	e, commitments, and engagement		
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	•	Page 216 in 2013 10-K, which in turn refers to: http://investor.key.com/ govdocs.aspx?iid=100334 Pages 11-22 in the 2014 Proxy Statement
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	•	Beth E. Mooney serves as KeyCorp's Chairman of the Board and Chief Executive Officer.
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	•	https://www.key.com/about/company- information/KeyCorp-Board-of- Directors.jsp Page 3 in the 2014 Proxy Statement
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	•	Page 19 Page 19 in the 2014 Proxy Statement
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	•	Pages 17-18 in the 2014 Proxy Statement

Profile Disclosure	Description	Reported	Location in report
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	•	Pages 3-4 in the 2014 Proxy Statement
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	•	Page 20 (specifically) and pages 11-22 (generally) in the 2014 Proxy Statement
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	•	Page 14 in the 2014 Proxy Statement
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	•	KeyCorp Corporate Governance Guide- lines available at: http://investor.key.com/ Cache/1001182286.PDF?Y=&0=PD- F&D=&FID=1001182286&T=&I- ID=100334
4.14	List of stakeholder groups engaged by the organization.	•	Page 16 in 2012 CR Report
4.15	Basis for identification and selection of stakeholders with whom to engage.	•	Page 6, 16 in 2012 CR Report
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	•	Pages S-3; 11-12; 33; 68 in the 2014 Proxy Statement
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	•	Pages S-3; 11-12; 33; 68 in the 2014 Proxy Statement



Profile Disclosure	Description	Reported	Location in report
Product and	d Service Impact		
Product por	rtfolio		
FS1	Policies with specific environmental and social components applied to business lines.	•	Pages 6-11
FS2	Procedures for assessing and screening environmental and social risks in business lines.	•	Page 14 in 2012 CR Report.
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	•	
FS4	Processes for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	•	Page 41 in 2012 CR Report.
FS5	Interactions with clients/investees/ business partners regarding environmental and social risks and opportunities.	•	Page 16 in 2012 CR Report.
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	•	
FS7	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	•	
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	•	

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Profile Disclosure	Description	Reported	Location in report
Audit			
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	•	As set forth in its charter, the Nominating and Corporate Governance Committee of the KeyCorp Board of Directors (the "Board"), oversees Key's policies and practices on significant issues of corporate social responsibility. It conducts an annual review with management of Key's policies and practices with respect to sustainability, including climate change. Key's management, including the CEO and senior leaders, manage and implement the sustainability policies and practices overseen by the Nominating and Corporate Governance Committee.
Active own	ership		
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues.	•	
FS11	Percentage of assets subject to positive and negative environmental or social screening.	•	
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting.	•	



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Profile Disclosure	Description	Reported	Location in report
Economic			
Economic p	performance		
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	•	Pages 4, 6-9, 11-13 Pages 2, 4 in 2013 10-K
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	•	Climate change presents opportunities for Key to pursue growth strategies for our clients and shareholders. In our Corporate Bank, our KeyBanc Capital Markets' Utilities, Power and Renewables group began investing in the renewable energy sector in 2007. We have since developed a balanced portfolio providing sustainable, reliable and affordable energy for customers in the United States. Our portfolio provides protection against regulatory risks associated with climate change by having significant investments in renewable energy and highly regulated investor owned utilities. Our strategy is to support our customers in their effort to manage against regulatory risks associated to climate change and seek out investments that prepare us for a carbon constrained environment.
EC3	Coverage of the organization's defined benefit plan obligations.	•	
EC4	Significant financial assistance received from government.	•	KeyCorp did not receive financial assistance in 2013.

			Fully ■ Partially ■ Not
Profile Disclosure	Description	Reported	Location in report
Market pre	sence		
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	•	
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	•	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	•	
Indirect eco	onomic impacts		
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	•	Pages 6-9, 11-13 https://www.key.com/about/ community/community-is-key.jsp https://www.key.com/about/ community/key-philanthropic- investment-banking.jsp
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	•	Pages 6-9, 11-13
Environme	ntal		
Materials			
EN1	Materials used by weight or volume.	•	
EN2	Percentage of materials used that are recycled input materials.	•	



Profile			
Disclosure	Description	Reported	Location in report
Environme	ntal (continued)		
Energy			
EN3	Direct energy consumption by primary energy source.	•	Page 14
EN4	Indirect energy consumption by primary source.	•	Page 14
EN5	Energy saved due to conservation and efficiency improvements.	•	Pages 14-16
			Page 8
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	•	Key conducted energy efficiency activities such as the replacement of boilers, furnaces, energy efficient upgrades to building controls, the installation of high efficiency HVAC and lighting systems. This included the installation of 250 building management systems and 99 lighting retrofit projects in 2013. These projects contributed to a 2.1 percent reduction in Scope 2 emissions, which represent the majority of our emissions.
			More info: https://www.key.com/about/ community/key-bank-environmental- commitment.jsp
			Page 14
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	•	https://www.key.com/about/ community/key-bank-environmental- commitment.jsp

			Fully ■ Partially ■ Not
Profile Disclosure	Description	Reported	Location in report
Water			
EN8	Total water withdrawal by source.	•	
EN9	Water sources significantly affected by withdrawal of water.	•	None
EN10	Percentage and total volume of water recycled and reused.	•	Key does not recycle or reuse water at this time but we are evaluating opportunities to do so in future years.
Biodiversity	1		
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	•	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	•	
EN13	Habitats protected or restored.	•	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	•	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	•	



Standard disclosures part 5. Ferrormance indicators				
Profile Disclosure	Description	Reported	Location in report	
Environmer	ntal (continued)			
Emissions,	effluents, and waste			
EN16	Total direct and indirect greenhouse gas emissions by weight.	•	Page 14	
EN17	Other relevant indirect greenhouse gas emissions by weight.	•	Page 14	
			Page 14	
			More info: https://www.key.com/about/ community/key-bank-environmental- commitment.jsp	
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.		Key's total Scope 1 and Scope 2 carbon footprint in 2013 was 84,708 metric tonnes CO2e, a reduction of 16.6% from our 2009 baseline and an increase of 0.5% over our 2012 emissions. We expect to achieve our goal of reducing our absolute carbon footprint by 20% by 2016.	
		•	Key has nearly \$1.2B in alternative energy investments committed as of December 31, 2013 and has financed over 5,000 MW in wind and solar. We work with our wind and solar power clients to help them secure financing for these critically important projects. Our partnership helps clients access the debt and equity capital markets as well as utilize economic incentives for their projects, such as Treasury grants, Department of Energy loan guarantee programs, and other stimulus initiatives.	
			Clients have the opportunity to join Key's efforts to positively impact the environment by purchasing fuel efficient, flexible or alternative fuel vehicles through our Go Green Auto Loan program which will help them reduce their personal carbon footprint.	

			Fully ● Partially ● Not
Profile Disclosure	Description	Reported	Location in report
EN19	Emissions of ozone-depleting substances by weight.	•	
EN20	NOx, SOx, and other significant air emissions by type and weight.	•	
EN21	Total water discharge by quality and destination.	•	
EN22	Total weight of waste by type and disposal method.	•	Page 15
EN23	Total number and volume of significant spills.	•	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	•	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	•	
Products ar	nd services		
	Initiatives to mitigate environmental		Page 15
EN26	impacts of products and services, and extent of impact mitigation.	•	https://www.key.com/about/ community/key-bank-environmental- commitment.jsp
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	•	
Compliance)		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	•	



Profile Disclosure	Description	Reported	Location in report
Environmer	ntal (continued)		
Transport			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	•	
Overall			
EN30	Total environmental protection expenditures and investments by type.	•	Our total expenditures on environmental protection for 2013 was approximately \$6 milion on energy efficiency improvements.
Social: Lab	or Practices and Decent Work		
Employmer	nt		
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	•	
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	•	
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	•	
LA15	Return to work and retention rates after parental leave, by gender.	•	

			Fully ● Partially ● No	
Profile Disclosure	Description	Reported	Location in report	
Labor/man	agement relations			
LA4	Percentage of employees covered by collective bargaining agreements.	•		
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	•		
Occupation	al health and safety			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	•	Key's Health and Safety Committee operates at the corporate-level and includes representatives from throughout the company and within all levels of the organization. All Key employees (100% of Key's workforce) are represented in Key's Health and Safety Committee.	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	•		
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	•		
LA9	Health and safety topics covered in formal agreements with trade unions.	•	Key does not have collective bargaining agreements.	



Profile	Description	Reported	Location in report				
Disclosure		'	Location in report				
	Social: Labor Practices and Decent Work (continued)						
Training an	d education						
LA10	Average hours of training per year per employee by gender, and by employee category.	•					
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	•					
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	•					
Diversity ar	nd equal opportunity						
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	•					
Equal remu	ineration for women and men						
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	•					
Social: Human Rights							
Investment and procurement practices							
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening	•					

			Fully	Partially	Not
Profile Disclosure	Description	Reported	Location in report		
HR2	Percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken.	•			
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	•			
Non-discrir	nination				
HR4	Total number of incidents of discrimination and corrective actions taken.	•			
Freedom of	association and collective bargaining				
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	•			
Child labor					
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	•			
Prevention	of forced and compulsory labor				
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	•			



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Profile Disclosure	Description	Reported	Location in report
Social: Hun	nan Rights (continued)		
Security pr	actices		
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	•	
Indigenous	rights		
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	•	
Assessmen	t		
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	•	
Remediatio	n		
HR11	Number of grievances related to human rights filed, addressed, and resolved through formal grievance mechanisms.	•	
Social: Soc	iety		
Local comr	nunities		
S01 (FSSS)	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	•	Pages 6-9 https://www.key.com/about/ community/community-development- lending-investment.jsp
FS13	Access points in low-populated or economically disadvantaged areas by type.	•	
FS14	Initiatives to improve access to financial services for disadvantaged people.	•	Pages 6-9 https://www.key.com/about/community/ community-development-banking.jsp

			FullyPartially	Not
Profile Disclosure	Description	Reported	Location in report	
S09	Operations with significant potential or actual negative impacts on local communities.	•		
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	•		
Corruption				
S02	Percentage and total number of business units analyzed for risks related to corruption.	•		
S03	Percentage of employees trained in organization's anti-corruption policies and procedures.	•	Each year, 100% of employees are required to complete a Conduct and Ethics training course, pass an exam and certify their compliance.	١,
S04	Actions taken in response to incidents of corruption.	•	Key's Code of Ethics states that there is a zero-tolerance policy in response to incidents of corruption.	
Public polic	у			
	Public policy positions and participation in public policy development and lobbying.	٠	Page 20 in 2014 Proxy Statement; "Statement of Political Activity"	
S05			https://www.snl.com/irweblinkx/govdocs.aspx?iid=100334	-
			https://www.snl.com/ Cache/1001182796.PDF?Y=&0=PE F&D=&FID=1001182796&T=&I- ID=100334	D-
	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	•	Page 20 in 2014 Proxy Statement; "Statement of Political Activity"	
S06			https://www.snl.com/irweblinkx/govdocs.aspx?iid=100334	-
			https://www.snl.com/ Cache/1001182796.PDF?Y=&0=PE F&D=&FID=1001182796&T=&I- ID=100334	D-



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Profile Disclosure	Description	Reported	Location in report		
Social: Soci	iety (continued)				
Anti-compe	titive behavior				
S07	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	•			
Compliance					
S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	•			
Social: Prod	duct Responsibility				
Customer h	ealth and safety				
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	•			
PR2	Total number of incidents of non- compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	•			
Product and	Product and service labelling				
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	•			

			Fully	Partially	Not
Profile Disclosure	Description	Reported	Location in report		
PR4	Total number of incidents of non- compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	•			
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	•			
FS15	Policies for the fair design and sale of financial products and services.	•	Pages 6-8		
FS16	Initiatives to enhance financial literacy by type of beneficiary.	•	Page 7		
Marketing (communications				
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	•			
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	•			
Customer p	rivacy				
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	•			
Compliance)				
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	•			



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