



Focused Forward



Our 2014 Corporate Responsibility Report provides transparency and clarity to you and other important partners on our journey. Feedback and questions about our corporate responsibility efforts and this report are welcomed and can be addressed to Andrew Watterson, KeyCorp's Head of Sustainability: Andrew\_Watterson@keybank.com or 216-689-5418.

To view past KeyBank Corporate Responsibility Reports, click here.

On the cover: The Rollins Wind project located in Penobscot County, Maine. This is a 60 MW wind farm developed by First Wind (acquired by SunEdison in November 2014) and financed by KeyBank in 2012. (Photo courtesy of SunEdison.)

This Content Index is a complement to KeyCorp's 2014 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. The GRI framework allows us to share our results in a manner comparable with our peers and industry benchmarks and organize our corporate responsibility efforts in a manner that accelerates our progress. We report on topics that are meaningful to our business and our stakeholders. 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.



## Standard disclosures part 1: Profile disclosures

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Profile 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 2014 10-K
Organizatio	nal profile		
2.1	Name of the organization.	•	KeyCorp
2.2	Primary brands, products, and/or services.	•	Page 4
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	•	Page 4 Pages 4-5 in 2014 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

<sup>\*</sup>Page locations shown in italic indicate reference within the current CR Report.

			<ul><li>Fully</li><li>Partially</li><li>Not</li></ul>
Profile Disclosure	Description	Reported	Location in report
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	•	Page 4  There were no material changes to size, structure or ownership during the reporting period.
2.10	Awards received in the reporting period.	•	Page 15, 28
Report para	ameters		
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	•	This report covers the calendar year 2014.
3.2	Date of most recent previous report (if any).	•	Previous report covered calendar year 2013.
3.3	Reporting cycle (annual, biennial, etc.)	•	Annual
3.4	Contact point for questions regarding the report or its contents.	•	Page 2, 29
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.

● Fully ● Partially ● Not



# Standard disclosures part 1: **Profile disclosures**

Profile Disclosure	Description	Reported	Location in report
Report para	ameters (continued)		
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).	•	None
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.	•	www.key.com/crreport
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.	•	Pages 10-18 of the 2015 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.	•	Pages 10-16 of 2015 Proxy Statement

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Profile Disclosure	Description	Reported	Location in report
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	•	Page 18 in the 2015 Proxy Statement
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	•	Pages 16-17 in the 2015 Proxy Statement
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 1-2 in the 2015 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 19 (specifically) and pages 10-18 (generally) in the 2015 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 13 in the 2015 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/ govdocs.aspx?iid=100334 and http:// investor.key.com/Cache/1001192654. PDF?Y=&0=PDF&D=&- FID=1001192654&T=&IID=100334



## Standard disclosures part 1: Profile disclosures

Profile Disclosure	Description	Reported	Location in report
4.14	List of stakeholder groups engaged by the organization.	•	Our stakeholders include but are not limited to: the KeyCorp Board of Directors, employees and their families, shareholders, debt holders, clients, contractors, industry peers, vendors and companies in our supply chain, our communities and their leadership, regulators, stock exchanges, national, state, and local government agencies, nonprofit agencies, and educational and research institutions.
4.15	Basis for identification and selection of stakeholders with whom to engage.	•	Every day, we execute our strategy with focus and discipline in order to meet and exceed stakeholder expectations, and we aim to communicate as clearly and as regularly with them as possible. We engage with each set of stakeholders in a variety of ways: through regular in-person meetings, by phone, email, online, and through social media. By surveying our stakeholders we learn of their expectations, concerns, and interests, and we believe this report is a substantive response to their requests for information.

			<ul><li>Fully ■ Partially ■ Not</li></ul>
Profile Disclosure	Description	Reported	Location in report
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	•	Pages S-3, 10-11, 17-18, 30, 64 in 2015 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, 10-11, 17-18, 30, 64 in 2015 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 6-9, 12-15, 17-19, 23-27
FS2	Procedures for assessing and screening environmental and social risks in business lines.	•	Pages 6-7
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	•	
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	•	Pages 6-7
FS5	Interactions with clients/investees/ business partners regarding environmental and social risks and opportunities.	•	Page 6
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	•	
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	•	
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	•	

*Page locations shown in italic indicate reference within the curr	ent CR Report.
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			<ul><li>Fully ■ Partially ■ Not</li></ul>
Profile Disclosure	Description	Reported	Location in report
Audit			
			Pages 6-7
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.	•	



Description	Reported	Location in report
erformance		
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.	٠	Pages 4, 8-13, 20-22 Parts II & IV in 2014 10-K
Financial implications and other risks and opportunities for the organization's activities due to climate change.	•	Pages 6-7, 12-13, 24-26 Pages 21- 23 in 2014 10-K
Coverage of the organization's defined benefit plan obligations.	•	
Significant financial assistance received from government.	•	KeyCorp did not receive financial assistance in 2014.
	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.  Financial implications and other risks and opportunities for the organization's activities due to climate change.  Coverage of the organization's defined benefit plan obligations.  Significant financial assistance	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.  Financial implications and other risks and opportunities for the organization's activities due to climate change.  Coverage of the organization's defined benefit plan obligations.  Significant financial assistance

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			<ul><li>Fully</li></ul>	<ul><li>Partially</li></ul>	<ul><li>Not</li></ul>
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				
	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.		Pages 8-13, 20-22		
EC8		•	https://www.key.cor community/commun		
200			https://www.key.cor community/key-phila investment-banking	anthropic-	
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	•	Pages 8-13, 20-22		



Profile Disclosure	Description	Reported	Location in report
Environmer	ntal		
Materials			
EN1	Materials used by weight or volume.	•	
EN2	Percentage of materials used that are recycled input materials.	•	
Energy			
			Pages 24-25
EN3	Direct energy consumption by primary energy source.	•	Approximately 2% of our energy and emissions reductions were due to a large corporate facility being vacated in 2014 and an additional 3% reduction was due to mild temperatures across our footprint.
	Indirect energy consumption by primary source.		Pages 24-25
EN4		•	Over 99% of indirect energy consumtion is from electricty purchase
EN5	Energy saved due to conservation and efficiency improvements.	•	Pages 23-26
			Pages 12-13, 23-26
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.
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	•	Pages 24-25

*Page locations shown in italic indicat	e reference within the current CR Report.
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			<ul><li>Fully ■ Partially ■ Not</li></ul>
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.
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.	•	



Profile Disclosure	Description	Reported	Location in report		
Environmer	Environmental (continued)				
Emissions,	Emissions, effluents, and waste				
			Pages 24-25		
EN16	Total direct and indirect greenhouse gas emissions by weight.	•	Approximately 2% of our energy and emissions reductions were due to a large corporate facility being vacated in 2014 and an additional 3% reduction was due to mild temperatures across our footprint.		
EN17	Other relevant indirect greenhouse gas emissions by weight.	•	Page 24		
			Pages 12, 13, 23-26		
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	•	https://www.key.com/about/ community/key-bank-environmental- commitment.jsp		
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 27		
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.	•			

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			<ul><li>Fully ● Partially ● Not</li></ul>
Profile Disclosure	Description	Reported	Location in report
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		
	Initiativas ta mitiaata anvironmental		Page 27
EN26	Initiatives to mitigate environmental 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.	•	
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 2014 were more than \$5 million of energy efficiency improvements.



Profile Disclosure	Description	Reported	Location in report
Social: Lab	or Practices and Decent Work		
Employmen	t		
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.	•	
Labor/mana	agement relations		
LA4	Percentage of employees covered by collective bargaining agreements.	•	0%. Key does not have 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.	•	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	•	

			<ul><li>Fully ■ Partially ■ No</li></ul>
Profile Disclosure	Description	Reported	Location in report
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.
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	neration for women and men		
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	•	



Profile	Description	Reported	Location in report
Disclosure Social: Hun		noportou	
	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	•	
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.	•	

			<ul><li>Fully</li></ul>	<ul><li>Partially</li></ul>	<ul><li>Not</li></ul>
Profile Disclosure	Description	Reported	Location in report		
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.	•			
Security pra	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.	•			



Profile Disclosure	Description	Reported	Location in report
Social: Soc	iety		
Local comr	nunities		
SO1 (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 8-13 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 8-11 https://www.key.com/about/community/ community-development-banking.jsp
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.	•	Pages 18-19 in 2014 10-K
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
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.

	*Page locations	shown in italic indicate	e reference within	the current CR Report.
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			<ul><li>Fully ● Partially ● Not</li></ul>
Profile Disclosure	Description	Reported	Location in report
Public polic	у		
			Page 19 in 2015 Proxy Statement; "Statement of Political Activity"
S05	Public policy positions and participation in public policy	•	https://www.snl.com/irweblinkx/gov-docs.aspx?iid=100334
	development and lobbying.		https://www.snl.com/ Cache/1001196436.PDF?Y=&0=PD- F&D=&FID=1001196436&T=&I- ID=100334
			Page 19 in 2015 Proxy Statement; "Statement of Political Activity"
S06	Total value of financial and in-kind contributions to political parties,		https://www.snl.com/irweblinkx/gov-docs.aspx?iid=100334
300	politicians, and related institutions by country.		https://www.snl.com/ Cache/1001196436.PDF?Y=&0=PD- F&D=&FID=1001196436&T=&I- ID=100334
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.	•	



Profile Disclosure	Description	Reported	Location in report						
Social: Product Responsibility									
Customer health 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	l service labelling								
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	•							
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 8-11						
FS16	Initiatives to enhance financial literacy by type of beneficiary.	•	Page 10						

		current CR Report.

			• Full	y Partially	<ul><li>Not</li></ul>
Profile Disclosure	Description	Reported	Location in report		
Marketing of	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 privacy					
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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