



Focused *Forward*

KeyCorp 2015 GRI Index

View current and previous editions of the KeyCorp CR Report and GRI Index at key.com/crreport.

This Content Index is a complement to KeyCorp's 2015 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.

Feedback

KeyCorp's 2015 CR Report provides transparency and clarity to you and other important partners. 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.



On the cover: A view of Seattle, Washington – one of KeyBank's core markets in the Pacific region.

GRI G4 Disclosure	Description	Reference/Response
G4-1	Statement from the most senior decision-maker of the organization	Page 7 of CR Report
G4-2	Description of key impacts, risks, and opportunities	Pages 9-11 of CR Report Pages 18-30 in 2015 10-K
G4-3	Name of the organization	KeyCorp
G4-4	Primary brands, products, and services	Page 4 of CR Report www.key.com
G4-5	Location of the organization's headquarters	Cleveland, OH
G4-6	Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report	All major operations are located within the United States of America
G4-7	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.
G4-8	Markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries)	Pages 4-5 of CR Report
G4-9	Scale of the organization	Pages 4-5 of CR Report

GRI G4 Disclosure	Description	Reference/Response																								
G4-10	<ul style="list-style-type: none">• Total number of employees by employment contract and gender• Total number of permanent employees by employment type and gender	<table><tr><th colspan="4">Employee diversity by category</th></tr><tr><th>Employee Category</th><th>Percent Female</th><th>Percent Minority</th><th>Percent Diverse</th></tr><tr><td>KeyCorp Board of Directors</td><td>36%</td><td>7%</td><td>43%</td></tr><tr><td>Executive Leadership Team</td><td>27%</td><td>9%</td><td>36%</td></tr><tr><td>Management / Professional¹</td><td>36%</td><td>11%</td><td>42%</td></tr><tr><td>KeyCorp Workforce</td><td>60%</td><td>19%</td><td>66%</td></tr></table>	Employee diversity by category				Employee Category	Percent Female	Percent Minority	Percent Diverse	KeyCorp Board of Directors	36%	7%	43%	Executive Leadership Team	27%	9%	36%	Management / Professional ¹	36%	11%	42%	KeyCorp Workforce	60%	19%	66%
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G4-11	Percentage of total employees covered by collective bargaining agreements	0%. Key does not have collective bargaining agreements.																								
G4-12	Description of the organization's supply chain	Our supply chain reflects the primary needs of our business in the financial services industry. Our primary suppliers provide technology solutions (hardware and software), payment processing, financial information services, consulting services and infrastructure support services for our branches. Given our business footprint described on page 5 of our CR Report , our suppliers are highly concentrated in the United States. For information regarding our supplier diversity initiatives, please see page 22 of our CR Report .																								
G4-13	Any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain	Page 6 of CR Report There were no material changes to size, structure or ownership during the reporting period.																								
G4-14	Whether and how the precautionary approach or principle is addressed by the organization	Key does not address the precautionary principle.																								

GRI G4 Disclosure	Description	Reference/Response
G4-15	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses	Key does not currently endorse nor subscribe to any charters or principles.
G4-16	Memberships of associations (such as industry associations) and national or international advocacy organizations	Key is active in chambers of commerce across our operating footprint, including the Greater Cleveland Partnership in our headquarters location of Cleveland, OH. We also view our participation in the following organizations as strategic to advancing our corporate responsibility efforts: Financial Services Roundtable, Boston Center of Corporate Citizenship, CDP, DiversityInc.
G4-17	<ul style="list-style-type: none"> • All entities included in the organization's consolidated financial statements or equivalent documents • Whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report 	Page 4 of CR Report Pages 4-5 in 2015 10-K
G4-18	<ul style="list-style-type: none"> • The process for defining the report content and the Aspect Boundaries • How the organization has implemented the Reporting Principles for Defining Report Content 	Pages 9-11 of CR Report <p>In 2015, Key completed our Impacts and Opportunities Assessment to identify and prioritize our most significant corporate responsibility topics. We began the assessment by completing extensive research and benchmarking to identify potential significant topics within the wider sustainability context of our industry. Additionally, we created a value chain map to determine where our impacts occur and the associated Aspect Boundaries. To prioritize our impacts, we completed extensive stakeholder engagement through interviews and surveys with both internal and external stakeholders. We synthesized and analyzed our findings before finally validating the results of the assessment with our Corporate Responsibility Council and the Corporate Responsibility Group. Through these collective actions, we demonstrate that the content of our report reflects the Reporting Principles of Materiality, Stakeholder Inclusiveness, Sustainability Context, and Completeness.</p>
G4-19	All the material Aspects identified in the process for defining report content	Pages 9 -11 of CR Report

GRI G4 Disclosure	Description	Reference/Response	
G4-20	For each material Aspect, the Aspect Boundary within the organization	<i>Topic</i>	<i>Material Inside?</i>
		Client Privacy & Data Security	Yes
		Diversity & Inclusion	Yes
		Economic Inclusion & Community Vitality	Yes
		Environmental Footprint	Yes
		Ethics, Compliance & Risk Management	Yes
		Fair & Transparent Client Experience	No
		Green Banking	No
		Reputation & Financial Performance	Yes
		Supply Chain Practices	Yes
		Thriving Employees	Yes
G4-21	For each material Aspect, the Aspect Boundary outside the organization	<i>Topic</i>	<i>Material Inside?</i>
		Client Privacy & Data Security	Yes
		Diversity & Inclusion	Yes
		Economic Inclusion & Community Vitality	Yes
		Environmental Footprint	Yes
		Ethics, Compliance & Risk Management	No
		Fair & Transparent Client Experience	Yes
		Green Banking	Yes
		Reputation & Financial Performance	Yes
		Supply Chain Practices	Yes
		Thriving Employees	No
G4-22	The effect of any restatements of information provided in previous reports and the reasons for such restatements	In 2014, we reported a total of 6,082 tons of waste. The correct total is 6,802 tons of waste for 2014. The total was misstated in the the final report.	
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	None	

GRI G4 Disclosure	Description	Reference/Response
G4-24	List of stakeholder groups engaged by the organization	Page 11 of CR Report
G4-25	Basis for identification and selection of stakeholder with whom to engage	<p>Page 11 of CR Report</p> <p>We identify and select stakeholders essential to our business operations across the enterprise. We engage those stakeholders who impact our business the most and upon whom we exert the most significant influence.</p>
G4-26	Approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process	<p>Page 11 of CR Report</p> <p>Our relationships are the foundation of our business, and we regularly engage with all of our stakeholders. We communicate with our stakeholders through the following channels, based on specific group:</p> <ul style="list-style-type: none"> • Employees: Surveys, town halls, performance reviews • Shareholders: Quarterly earnings calls, annual shareholders' meeting, investor calls, meetings • Clients: In-person, regular calls, emails, surveys • Communities: In-person meetings, town halls, community meetings • Regulators: CRA and Compliance reviews, regular meetings • Suppliers: In-person meetings, procurement procedures • Industry Associations: In-person meetings, conferences <p>Pages S-3, 11-12, 19-20, 32, 69 of 2016 Proxy Statement</p>

GRI G4 Disclosure	Description	Reference/Response
G4-27	Key topics and concerns that have been raised through stakeholder engagements, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns	<p>Page 11 of CR Report</p> <ul style="list-style-type: none"> • Employees: Engagement, career opportunities, wellness • Shareholders: Financial performance and risk mitigation • Clients: Products and services, privacy and data security, engagement in our communities, financial guidance and expertise • Communities: Philanthropic investments, access to products and services for underserved communities, civic engagement and community support, community leadership • Regulators: Compliance, CRA & Fair lending performance, risk mitigation • Suppliers: Partnership opportunities and relationship continuity • Industry Associations: Community relationships and regulatory issues <p>Pages S-3, 11-12, 19-20, 32, 69 of 2016 Proxy Statement</p>
G4-28	Reporting period (such as fiscal or calendar year) for information provided	This report covers the calendar year 2015.
G4-29	Date of most recent previous report	Previous report covered calendar year 2014.
G4-30	Reporting cycle (such as annual, biennial)	Annual
G4-31	Contact point for questions regarding the report or its contents	Pages 2, 37 of CR Report
G4-32	<ul style="list-style-type: none"> • The “in accordance” option the organization has chosen • The GRI Content Index for the chosen option • The reference to the External Assurance Report, if the report has been externally assured 	www.key.com/crreport
G4-33	<ul style="list-style-type: none"> • Policy and current practice with regard to seeking external assurance for the report • If not included in the assurance report accompanying the sustainability report, the scope and basis of any external assurance provided • The relationship between the organization and the assurance providers • Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report 	The content of this report is reviewed internally with Subject Matter Experts, Leadership including the CR Council, and our legal and compliance teams instead of engaging an external auditor. In addition, the reporting process undergoes a internal risk review every three years.

GRI G4 Disclosure	Description	Reference/Response
G4-34	The governance structure of the organization, including committees of the highest governance body; committees responsible for decision-making on economic, environmental, and social impacts	Pages 11-20 of the 2016 Proxy Statement
G4-35	Process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees	Page 8 of the CR Report Page 15 of 2016 Proxy Statement The Nominating and Governance Committee of our Board of Directors oversees our Corporate Responsibility practices. Our Head of Corporate Responsibility meets with this Committee annually.
G4-36	Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body	Page 8 of the CR Report Our Head of Corporate Responsibility reports to our Head of Corporate Center, who reports to our CEO Beth Mooney. Our Head of Corporate Responsibility meets with the Nominating and Governance Committee of the Board of Directors annually.
G4-37	Processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics; if consultation is delegated, to whom, and any feedback processes to the highest governance body	Page 20 of 2016 Proxy Statement
G4-38	Composition of the highest governance body and its committees	Pages 11-20 of the 2016 Proxy Statement
G4-39	Whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement)	Beth E. Mooney serves as KeyCorp's Chairman of the Board and Chief Executive Officer.
G4-40	The nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	Pages 1-2 of 2016 Proxy Statement
G4-41	Processes for the highest governance body to ensure conflicts of interest are avoided and managed; and whether conflicts of interest are disclosed to stakeholders	Pages 17-19 of 2016 Proxy Statement
G4-44	a. Processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics b. Actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics	KeyCorp Corporate Governance Guidelines available at http://investor.key.com/govdocs.aspx?id=100334

GRI G4 Disclosure	Description	Reference/Response
G4-45	<p>a. The highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities</p> <p>b. Whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental and social impacts, risks, and opportunities</p>	Pages 13-17, 19 of 2016 Proxy Statement
G4-47	Frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities	Page 15 of 2016 Proxy Statement
G4-49	Process for communicating critical concerns to the highest governance body	Page 20 of 2016 Proxy Statement
G4-53	How stakeholders' views are sought and taken into account regarding remuneration	Page 19 of 2016 Proxy Statement
G4-56	Values, principles, standards and norms of behavior such as codes of conduct and codes of ethics	<p>Key maintains the highest standards of ethical behavior throughout our operations. To learn more about our commitment, please see our Code of Ethics and Corporate Governance Guidelines.</p>
G4-DMA	Economic Inclusion & Community Vitality	<p>Pages 12-15, 23-26 of CR Report</p> <p>Key builds thriving communities by investing in products and services that meet the needs of all individuals and communities. We are committed to building the financial capabilities that enable our clients to make good financial decisions. We build our communities through investments of time, talent and financial resources to organizations that align with our strategies and corporate values.</p> <p>Thriving communities are a reflection of our community lending, investment and philanthropy activities. Our Community Development team manages and monitors capital devoted to community lending, investments and access to our financial products. The team also leads our Community Reinvestment Act activities. Our KeyBank Foundation develops and executes a focused strategy that supports education, workforce and thriving communities. We lead through our commitment to strategic grants, employee matching grants, employee volunteer hours and civic leadership. We are proud of the service provided by our employees through our community programs and engagement in our KeyBank Business Impact Networking Groups. Our goals include maintaining our annual capital devoted to community development, increasing the financial capability of our clients, enhancing access to financial capability programming, and increasing our employee volunteerism participation.</p>

GRI G4 Disclosure	Description	Reference/Response
G4-EC1	Direct economic value generated and distributed	Pages 5, 23-26 of CR Report Pages 36-37 of 2015 10-K
G4-S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs	Pages 11-14, 23-26 of CR Report https://www.key.com/about/community/community-development-lending-investment.jsp
G4-FS14	Initiatives to improve access to financial services for disadvantaged people	Pages 12-15, 23-26 of CR Report
G4-FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	Pages 12 -15 of CR Report
G4-DMA	Reputation & Financial Performance	Pages 5, 36 of CR Report Key actively manages our strong reputation to drive peer leading financial performance. Aligned with our strategy, we build meaningful client and community relationships, by transparently marketing our products and services, and by maintaining a disciplined approach towards financial management and growth. We measure our success by engaging our clients and community stakeholders directly and through inquiries and surveys. Enhancing the satisfaction of these important stakeholder groups is essential. Additionally, we measure and manage our financial performance through traditional metrics. We aim to drive growth through our Focused <i>Forward</i> objectives. To learn more about our commitment to Reputation & Financial Performance, please read our Annual Report .
G4-EC1	Direct economic value generated and distributed	Pages 5, 23-26 of CR Report Pages 36-37 of 2015 10-K

GRI G4 Disclosure	Description	Reference/Response
G4-DMA	Green Banking	<p>Pages 16-17 of CR Report</p> <p>Key provides products and services that enhance our clients' efforts to improve efficiency and advance alternative energy. We promote the implementation of sustainability practices in client relationships and investments.</p> <p>We proactively manage our commitment to Green Banking through our client interactions and our lending and investment practices. In both our Community Bank and Corporate Bank, we build and maintain business relationships advancing energy efficiency and renewable energy. Our Key4Green program drives these practices within our Community Bank through both our automobile lending and small business financing. Our KeyBanc Capital Markets team within the Corporate Bank lends significant financial capital annually to renewable energy projects. Through client interactions, we encourage customers to leverage electronic statements and other electronic resources. We set targets in each of these areas and the separate lines of business are responsible for their performance. Our Sustainability team supports these lines of business and reports progress across the enterprise of our green banking activities.</p>
G4-EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	<p>Pages 16-17, 31-34 of CR Report</p> <p>Page 23 of 2015 10-K</p>
G4-EN27	Extent of impact mitigation of environmental impacts of products and services	<p>Page 16-17 of CR Report</p> <p>https://www.key.com/about/community/key-bank-environmental-commitment.jsp</p>
G4-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	<p>Page 16-17 of CR Report</p> <p>https://www.key.com/about/community/key-bank-environmental-commitment.jsp</p>

GRI G4 Disclosure	Description	Reference/Response
G4-DMA	Environmental Footprint	Pages 30-34 of CR Report Minimizing our impact on our environment is an important demonstration of our commitment to operating responsibly. Energy, waste and paper are the three main components of our environmental impact. Our stakeholders expect us to mitigate these impacts as much as possible. Key proactively minimizes our operation's environmental impacts by implementing practices for responsible energy consumption, improving efficiency, and reducing waste and emissions. We measure and set targets for our energy consumption, greenhouse gas emissions, waste reduction, recycling, and paper use. Our Sustainability, Real Estate, Procurement and Technology teams regularly work together to manage our performance. To learn more about our environmental goals and performance, please see our Responsible Operations section.
G4-EN3	Energy consumption within the organization	Page 33 of CR Report
G4-EN6	Reduction of energy consumption	Page 33 of CR Report Approximately 7.6% of our direct and indirect energy reductions were due to facilities closures and mild temperatures; the remaining 3.5% is attributed to infrastructure improvements.
G4-EN7	Reductions in energy requirements of products and services	Pages 31-33 of CR Report
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1)	Page 33 of CR Report
G4-EN16	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Page 33 of CR Report
G4-EN17	Other indirect greenhouse gas (GHG) emissions (Scope 3)	Page 33 of CR Report
G4-EN19	Reduction of greenhouse gas (GHG) emissions	Pages 32-33 of CR Report https://www.key.com/about/community/key-bank-environmental-commitment.jsp Approximately 10.2% of our Scope 1 & 2 emissions reductions were due to changes in emissions factors, including cleaner power procurement and updated EPA emissions calculations, 4.0% can be attributed to mild temperatures, and 2.5% can be attributed to site closures and infrastructure improvements.

GRI G4 Disclosure	Description	Reference/Response
G4-EN23	Total weight of waste by type and disposal method	Page 34 of CR Report Total Waste to Landfill: 1,755.23 tons Total Waste Recycled: 4,382.20 tons Total Waste: 6,137.44 tons
G4-EN27	Extent of impact mitigation of environmental impacts of products and services	Pages 31-34 of CR Report https://www.key.com/about/community/key-bank-environmental-commitment.jsp
G4-EN31	Total environmental protection expenditures and investments, by type	Our total expenditures on environmental protection for 2015 were more than \$4 million of energy efficiency improvements.
G4-DMA	Thriving Employees	Pages 18-21, 27-30 of CR Report Key attracts and retains top talent by investing in a culture of inclusion, respect and engagement, professional development, and health and wellness. Together we create a strong sense of community, where each employee has the opportunity for personal growth, to do work that matters, and work in a place where results are rewarded. We measure our progress through several targets designed to leverage engagement and wellness. All of our employees complete annual performance reviews. We also seek to enhance participation in our KeyBank Business Impact Networking Groups, which bring employees together through a common interest. Our annual Neighbors Make The Difference Day unites our employees together in service and we seek to further enhance participation in this wonderful event. Personal wellness is an essential component of employees being their best selves. We also encourage participation in our Healthy Action programs and 401(k) programs. We build our diverse and inclusive culture through our recruiting and retention practices. We seek to expand our recruitment of diverse candidates, in addition to enhancing diversity representation across the enterprise. We aim to minimize turnover through our commitment to professional growth and engagement. Our Human Resources team works closely with other teams across the enterprise to facilitate our employee programs. To learn more, please read our Responsible Operations section.
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	100%

GRI G4 Disclosure	Description	Reference/Response
G4- DMA	Diversity & Inclusion	<p>Pages 18-21 of CR Report</p> <p>Key embraces creating a diverse and inclusive culture that fosters the attraction and retention of a diverse workforce that operates in a diverse workplace. We demonstrate this commitment through the depth and diversity of Key's Board of Directors, our leadership, diverse suppliers, our employees and the community organizations we support.</p> <p>Our Diversity & Inclusion Council develops our strategy and programming to build an inclusive workplace supporting a diverse workforce. Our CEO Beth Mooney leads the Council and works closely with council members comprised of cross-functional leaders across the enterprise.</p>

G4-LA12 Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity

Employee diversity by category			
Employee Category	Percent Female	Percent Minority	Percent Diverse
KeyCorp Board of Directors	36%	7%	43%
Executive Leadership Team	27%	9%	36%
Management / Professional ¹	36%	11%	42%
KeyCorp Workforce	60%	19%	66%

Employee demographics segmented by age			
Employee Category	Ages 34 and under	Ages 35 - 54	Ages 55 - older
KeyCorp Board of Directors ¹	0%	14%	86%
Executive Leadership Team	0%	36%	64%
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KeyCorp Workforce	30%	50%	19%

¹Included in 2016 proxy
²This employee population is inclusive of mid-level managers/professionals and above

GRI G4 Disclosure	Description	Reference/Response
G4-DMA	Supply Chain Practices	<p>Pages 22, 30-31, 34 of CR Report</p> <p>Key demonstrates supplier diversity and sets expectations for suppliers' responsible performance through policies, assessments and communication of Key's ethics, values and corporate responsibility priorities.</p> <p>We ensure our diverse supply base by devoting a baseline of our annual spend to women-based, minority-based, veteran-based, and LGBT suppliers. Each year, the Key procurement team analyzes our performance and sets new targets for diverse spend. Our goal is to annually increase our number of diverse suppliers.</p> <p>We expect our suppliers to act responsibly and manage their environmental practices, human rights, and labor practices. We engage with strategic partners on sustainability and set goals to improve their environmental and social performance. Our Sustainability team engages with our Real Estate and Enterprise Technology & Operations teams regularly to evaluate our supplier engagement and monitor opportunities for improvement. Additionally, our Procurement, Legal, Ethics, and Sustainability teams collaborate to manage our expectations for ethical supplier conduct.</p>
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken	<p>Zero</p> <p>Supplier Code of Conduct: https://www.key.com/kco/images/Supplier%20Code%20of%20Conduct_2192016.pdf </p>
G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	<p>Zero</p> <p>Supplier Code of Conduct: https://www.key.com/kco/images/Supplier%20Code%20of%20Conduct_2192016.pdf </p>
G4-HR11	Significant actual and potential negative human rights impacts in the supply chain and actions taken	<p>Zero</p> <p>Supplier Code of Conduct: https://www.key.com/kco/images/Supplier%20Code%20of%20Conduct_2192016.pdf </p>

GRI G4 Disclosure	Description	Reference/Response
G4-DMA	Ethics, Compliance, and Risk Management	<p>KeyCorp's Code of Ethics</p> <p>Key expects ethical behavior from our employees to ensure we operate with the highest ethical standards and integrity. We commit to identifying and mitigating risks associated with our business operations, client and community relationships, brand reputation, and to adhering to all applicable laws and regulations and meeting or exceeding the expectations of our shareholders, clients, employees, community partners and our regulators.</p> <p>We maintain the highest standards through extensive employee training. We set targets associated with compliance training and ethics certification. Externally, we created a supplier code of conduct to communicate our values to current and potential suppliers. Our Corporate Ethics & Compliance team manages our performance. This team works closely with our executive leaders and line of business managers to reinforce ethical behavior across the enterprise.</p>
G4-S03	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified	Pages 18-19 of 2015 10-K
G4-S04	Communication and training on 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.
G4-S05	Confirmed incidents of corruption and actions taken	Key's Code of Ethics states that there is a zero-tolerance policy in response to incidents of corruption.
G4-S06	Total value of political contributions by country and recipient/beneficiary	<p>Page 21 of 2016 Proxy Statement</p> <p>Statement of Political Activity: http://investor.key.com/Cache/1500082696.PDF?Y=&O=PDF&D=&FID=1500082696&T=&IID=100334</p>
G4-DMA	Fair & Transparent Client Experience	<p>Pages 14-15 of CR Report</p> <p>Key ensures the fair treatment of all our customers by delivering responsible products and services with clear and readily available information, disclosures and support services.</p> <p>We measure our progress in client experience through monitoring and responding to instances of both client complaints and compliance issues. We provide training in fair and responsible lending practices. Additionally, we review our marketing communications for corrections and client complaints. Our Corporate Center team manages our marketing and communications efforts, and works closely with teams across the enterprise to enhance our performance.</p>

GRI G4 Disclosure	Description	Reference/Response
G4-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	Zero To learn more information about any claims, please see our KeyBank Public File: https://www.key.com/kco/images/keypublicfile.pdf
G4-DMA	Client Privacy & Data Security	<p>Pages 12, 14-15 of CR Report</p> <p>Key protects our clients' information and privacy by actively obtaining appropriate permissions to maintain data security and taking extensive protective measures to prevent data incidents. We measure and manage client privacy and data protection through extensive employee training. We maintain our Ethics Helpline to provide all stakeholders with the opportunity to report incidents. We track the number of client complaints and incidents associated with privacy and data security. Additionally, we encourage client education on keeping data secure through online tips and other client materials. Our Enterprise Technology & Operations and Enterprise Security Services teams manage our performance. The teams work closely with our lines of business to build our programs for understanding and addressing client privacy and data security issues.</p>
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Zero To learn more information about any claims, please see our KeyBank Public File: https://www.key.com/kco/images/keypublicfile.pdf

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[@KeyBank_Help](https://twitter.com/KeyBank_Help)
[@Key4Women](https://twitter.com/Key4Women)

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facebook.com/KeyBank

