



KeyCorp 2017 GRI Index

This Content Index is a complement to KeyCorp's 2017 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.

[View this and previous KeyCorp Corporate Responsibility Reports at key.com/crreport.](http://key.com/crreport)

Feedback: KeyCorp's 2017 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.





Item	Description	Response
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General Disclosures

Organizational Profile

102-1	Name of the Organization	KeyCorp Page 1 of 2017 10-K
102-2	Activities, brands, products, and services	Pages 3-5 of 2017 CR Report Page 4 of 2017 10-K KeyBank may not offer some products and services in certain markets based on state and local laws or restrictions of such products and services. KeyBank maintains a list of “prohibited and restricted industries.” KeyBank does not extend credit to industries on the prohibited list, and industries on the restricted list require additional review prior to extending credit. These lists are reviewed and approved by our Enterprise Risk Management Committee. KeyBank does not publish its banned products.
102-3	Location of headquarters	Cleveland, OH Page 1 of 2017 10-K
102-4	Location of operations	All major operations are located within the United States of America. See page 4 of our 2017 CR report for additional details about Key's footprint Page 5 of 2017 10-K
102-5	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. Pages 4-5 of 2017 10-K
102-6	Markets served	Pages 3-4 of 2017 CR Report Pages 4-5 of 2017 10-K
102-7	Scale of the organization	Pages 3-4 of 2017 CR Report Pages 4-5 of 2017 10-K



Item	Description	Response																																																								
102-8	Information on employees and other workers	<table><tr><th colspan="7">Key U.S. Employee Diversity in December 2017</th></tr><tr><th>Employee Category</th><th>Female</th><th>White</th><th>Black/African American</th><th>Hispanic/Latino</th><th>Asian</th><th>All Other</th></tr><tr><td>KeyCorp Board of Directors</td><td>31%</td><td>88%</td><td>12%</td><td>0%</td><td>0%</td><td>0%</td></tr><tr><td>Executive Leadership Team</td><td>27%</td><td>85%</td><td>7%</td><td>4%</td><td>5%</td><td>0%</td></tr><tr><td>Management / Professional¹</td><td>50%</td><td>87%</td><td>5%</td><td>4%</td><td>3%</td><td>1%</td></tr><tr><td>Professionals</td><td>50%</td><td>84%</td><td>6%</td><td>3%</td><td>7%</td><td>1%</td></tr><tr><td>Sales Workers, Admin. Support, and Service Workers</td><td>69%</td><td>76%</td><td>10%</td><td>7%</td><td>4%</td><td>2%</td></tr><tr><td>Total KeyCorp Workforce (19,447 Employees)</td><td>60%</td><td>80%</td><td>8%</td><td>5%</td><td>5%</td><td>2%</td></tr></table>	Key U.S. Employee Diversity in December 2017							Employee Category	Female	White	Black/African American	Hispanic/Latino	Asian	All Other	KeyCorp Board of Directors	31%	88%	12%	0%	0%	0%	Executive Leadership Team	27%	85%	7%	4%	5%	0%	Management / Professional ¹	50%	87%	5%	4%	3%	1%	Professionals	50%	84%	6%	3%	7%	1%	Sales Workers, Admin. Support, and Service Workers	69%	76%	10%	7%	4%	2%	Total KeyCorp Workforce (19,447 Employees)	60%	80%	8%	5%	5%	2%
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102-9	Supply Chain	<p>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.</p> <p>Given our business footprint described on pages 3-4 of our CR Report, our suppliers are highly concentrated in the United States. For information regarding our supplier diversity initiatives, please see page 25 of our CR Report and https://www.key.com/about/supplier-information/key-supplier-diversity.jsp.</p> <p>For information about our Sustainable Supply Chain efforts within our operations, please see page 32 of the 2017 CR Report</p>																																																								
102-10	Significant changes to the organization and its supply chain	<p>There were no material changes to size, structure or ownership during the reporting period.</p> <p>Pages 5-6 of 2017 CR Report</p>																																																								



Item	Description	Response
102-11	Precautionary Principle or approach	Key does not address the precautionary principle. For additional details regarding our approach to risk management and product development related to climate change, see sections 2.2, 2.3 of our 2018 CDP Response . For information regarding development and introduction of products and services, see section 2.4 of our 2018 CDP Response .
102-12	External initiatives	Key is a founding member of the Transformational Diversity and Inclusion Initiative through Catalyst, which was launched in March of 2017 and of which Key is a founding member. "Catalyst CEO Champions For Change" is a group of 50+ CEOs pledging to advance more women into all levels of leadership.
102-13	Membership of associations	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, including: Financial Services Roundtable, Boston Center of Corporate Citizenship, CDP, DiversityInc, HRC, The Conference Board.
Strategy		
102-14	Statement from senior decision-maker	Page 3 of 2017 CR Report



Item	Description	Response
102-15	Key impacts, risks, and opportunities	<p>In 2014 and 2015, a comprehensive “Impacts and Opportunities Assessment” was conducted, which engaged stakeholders to identify and prioritize Environmental, Social, and Governance (ESG) topics. Key identified 10 ESG topics significant to managing the bank’s CR performance.</p> <p>Of the 10 significant topics, four were identified as “License to Operate,” which included topics that are business necessities requiring the bank to successfully manage in order to retain the right to conduct business.</p> <p>They are:</p> <ul style="list-style-type: none">• Client Privacy and Data Security• Ethics, Compliance, and Risk Management• Fair & Transparent Client Experience• Reputation & Financial Performance <p>Six were identified as “Differentiators,” which included topics that help Key set itself apart from peers.</p> <p>Key focused attention on four of the differentiator topics that it believes can significantly affect near-term progress to accelerate corporate responsibility at Key:</p> <ul style="list-style-type: none">• Diversity & Inclusion• Economic Inclusion & Community Vitality• Green Banking• Thriving Employees <p>The remaining differentiator topics are:</p> <ul style="list-style-type: none">• Environmental Footprint• Supply Chain Practices <p>Key remains focused on managing all 10 significant topics and is well-positioned to excel and make meaningful progress on them.</p> <p>Page 8 of 2016 CR Report</p> <p>Pages 22-31 of 2017 10-K</p> <p>Page 9 of 2015 CR Report</p>

Ethics and Integrity

102-16	Values, principles, standards, and norms of behavior	<p>Key maintains the highest standards of ethical behavior throughout our operations. To learn more about our commitment, please see our Code of Ethics.</p> <p>Corporate Governance Guidelines</p> <p>Our Supplier Code of Conduct</p>
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Item	Description	Response
Governance		
102-18	Governance structure	Page 7 of 2017 CR Report Corporate Governance Guidelines Pages 11-18 of 2018 Proxy Statement Page 190 of 2017 10-K Investor Relations
102-19	Delegating authority	Page 13 of 2018 Proxy Statement <p>The Nominating and Governance Committee of our Board of Directors oversees our Corporate Responsibility and Sustainability practices. Our Head of Corporate Responsibility meets with this Committee annually.</p> <p>Key's Corporate Responsibility Group, led by Senior Vice President and Senior Director, Corporate Community Initiatives and Relations, oversees Key's CR strategy and initiatives and is responsible for ensuring Key continues its longstanding responsible approach to banking, citizenship, and operations.</p> <p>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.</p> <p>Distinct from Key's CR Group is Key's Corporate Responsibility Council, chaired the president of the Corporate Bank. The Council, comprised of senior leaders across the enterprise, provides leadership and ensures the entire bank adheres to the CR priorities as it executes corporate strategy. The Council meets on a quarterly basis and works closely with the CR Group.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>Key's Corporate Responsibility Group, led by Senior Vice President and Senior Director, Corporate Community Initiatives and Relations, oversees Key's CR strategy and initiatives and is responsible for ensuring Key continues its longstanding responsible approach to banking, citizenship, and operations.</p> <p>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.</p> <p>Distinct from Key's CR Group is Key's Corporate Responsibility Council, chaired the president of the Corporate Bank. The Council, comprised of senior leaders across the enterprise, provides leadership and ensures the entire bank adheres to the CR priorities as it executes corporate strategy. The Council meets on a quarterly basis and works closely with the CR Group.</p>
102-21	Consulting stakeholders on economic, environmental, and social topics	Pages 17-18 of 2018 Proxy Statement Pages 7, 18 of 2017 CR Report Investor Relations contact information



Item	Description	Response
102-22	Composition of the highest governance body and its committees	Page 13 of 2018 Proxy Statement Page 21 of 2017 CR Report
102-23	Composition of the highest governance body and its committees	Beth E. Mooney serves as KeyCorp's Chairman of the Board and Chief Executive Officer. Pages 11-18 of 2018 Proxy Statement
102-24	Chair of the highest governance body	Pages 1-12 of 2018 Proxy Statement Nominating and Corporate Governance Committee Charter
102-25	Conflicts of interest	Pages 16-17 of 2018 Proxy Statement
102-28	Evaluating the highest governance body's performance	Page 13 of 2018 Proxy Statement KeyCorp Corporate Governance Guidelines Nominating and Corporate Governance Committee Charter Compensation and Organization Committee Charter
102-29	Identifying and managing economic, environmental, and social impacts	Pages 11-18 of 2018 Proxy Statement
102-31	Review of economic, environmental, and social topics	Pages 23-24 of 2017 10-K Section 2.2 of 2018 CDP Response
102-33	Communicating critical concerns	Page 18 of 2018 Proxy Statement
102-37	Stakeholders involvement in remuneration	Pages 17, 37-38 of 2018 Proxy Statement Pages 7, 9, 18 of 2017 CR Report



Item	Description	Response
Stakeholder Engagement		
102-40	List of stakeholder groups	Page 18 of 2017 CR Report
102-41	Collective bargaining agreements	0%. Key does not have collective bargaining agreements.
102-42	Identifying and selecting stakeholders	Pages 9, 18, 25, 30, 32 of 2017 CR Report 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. In addition, with the National Community Benefits plan, we identified organizations to serve on both a national and three local Community Advisory Councils to monitor KeyBank's progress against the plan.
102-43	Approach to stakeholder engagement	Pages 9, 18, 32 of 2017 CR Report Pages iv, 14-15, 17-19, 37 of 2018 Proxy Statement 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: <ul style="list-style-type: none"> • Employees: nearly continuously engaged via surveys, town halls, performance reviews • Shareholders: Quarterly earnings calls, annual shareholders' meeting, investor calls, meetings • Clients: multiple times annually – in-person, regular calls, emails, surveys • Communities: very frequent, but at minimum quarterly in-person meetings and town halls and established a National Community Advisory Council and three Local Community Advisory Councils which meets twice annually • Regulators: at least quarterly – CRA and Compliance reviews, regular meetings • Suppliers: For many of our largest suppliers – at least quarterly – in-person meetings, procurement procedures • Industry Associations: This varies in frequency – in-person meetings, conferences Employees and suppliers who are featured, review, approve, or supply data for our CR reporting are engaged in the reporting process.
102-44	Key topics and concerns raised	Pages 9, 19, 21-22 of 2017 CR Report We report performance against the National Community Benefits Plan, Environmental, Social and Governance Topics, Philanthropic support and community engagement. Key responds by engaging with the Corporate Responsibility Officer for the relevant market and/or the appropriate representative in the Corporate Responsibility Group or line of business who can address the stakeholders' concerns. Comments emailed or written are stored in the Company's public file available upon request.



Item	Description	Response
Reporting Practice		
102-45	Entities included in the consolidated financial statements	<p>Pages 4-5 of 2018 10-K Page 4 of 2017 CR Report This report covers all entities included in our 2018 10-K Pages 8-11 of 2015 CR Report</p> <p>In 2015, Key completed an 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.</p> <p>We identified 10 ESG topics significant to managing the bank's CR performance. Of the 10 significant topics, four were identified as "License to Operate," which included topics that are business necessities requiring the bank to successfully manage in order to retain the right to conduct business, and six were identified as "Differentiators," which included topics that help Key set itself apart from peers.</p>
102-46	Defining report content and topic boundaries	<p>License to operate topics are:</p> <ul style="list-style-type: none">• Client Privacy & Data Security• Ethics, Compliance, & Risk Management• Fair & Transparent Client Experience• Reputation & Financial Performance <p>Differentiator topics are:</p> <ul style="list-style-type: none">• Diversity & Inclusion• Economic Inclusion & Community Vitality• Environmental Footprint• Green Banking• Supply Chain Practices• Thriving Employees



Item	Description	Response
102-47	List of material topics	<p>Pages 8-11 of 2015 CR Report</p> <p>In 2015, Key completed an 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.</p> <p>We identified 10 ESG topics significant to managing the bank's CR performance. Of the 10 significant topics, four were identified as "License to Operate," which included topics that are business necessities requiring the bank to successfully manage in order to retain the right to conduct business, and six were identified as "Differentiators," which included topics that help Key set itself apart from peers.</p> <p>License to operate topics are:</p> <ul style="list-style-type: none">• Client Privacy & Data Security• Ethics, Compliance, & Risk Management• Fair & Transparent Client Experience• Reputation & Financial Performance <p>Differentiator topics are:</p> <ul style="list-style-type: none">• Diversity & Inclusion• Economic Inclusion & Community Vitality• Environmental Footprint• Green Banking• Supply Chain Practices• Thriving Employees



Item	Description	Response
102-48	Restatements of information	<p>In 2016, we reported Scope 3 emissions associated with air travel using an out of date emissions factor. The emissions associated with air travel were 10,967 metric tonnes of CO₂e. Taking into account the new emissions factors, the emissions are revised to 11,455 metric tonnes CO₂e.</p> <p>In 2017, we integrated the legacy real estate associated with the acquisition of First Niagara Bank and set new baselines based on the operational control of the combined real estate as of 1/10/2017. We then established a new emissions baseline for KeyCorp for 2016.</p> <p>We reported 2016 square footage as 8.2 million square feet. The new baseline is 9.65 million square feet. This resulted in corresponding increases in direct energy, indirect energy, Scope 1, and Scope 2 emissions.</p> <p>Previously reported</p> <ul style="list-style-type: none">• Direct Energy 186,170 GJ• Indirect Energy 396,939 GJ• Scope 1 emissions 9,996 mtCO₂e• Scope 2 emissions 50,619 mtCO₂e <p>These are upwardly adjusted to</p> <ul style="list-style-type: none">• Direct Energy 259,023 GJ• Indirect Energy 502,385 GJ• Scope 1 emissions 13,719 mtCO₂e• Scope 2 emissions 51,857 mtCO₂e
102-49	Changes in reporting	None
102-50	Reporting period	This report covers the calendar year 2017.
102-51	Date of most recent report	Previous report covered calendar year 2016.
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Page 2 of 2017 CR Report
102-55		GRI Content Index



Item	Description	Response
102-56	External assurance	<p>Page 2 of 2017 CR Report</p> <p>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. Internal controls on the approval and review process are verified annually through a peer testing procedure. In addition, the reporting process undergoes a internal risk review every three years.</p> <p>Information pertaining to our environmental performance is verified annually through an external assurance provider. Scope 1 and 2 emissions are fully verified. Scope 3 emissions related to corporate travel are also verified.</p> <p>Further, Key maintains an Inventory Management Plan (IMP), which is developed in conjunction with a third-party vendor to conform to consistent policies and procedures for maintaining relevant environmental data. The IMP is updated annually.</p>

Management Approach Disclosures

205: Anti-Corruption

205-1	Operations assessed for risks related to corruption	<p>Pages 20-29 of 2018 10-K</p> <p>Compliance, Operational, and Reputation Risks are material risks related to corruption or failure to operate in a responsible manner</p> <p>Key has a senior level management committee, the Enterprise Risk Management Committee, consisting of Beth Mooney, CEO and Chairman of the Board, and other senior officers at Key, including our Chief Risk Officer. The ERM Committee meets weekly and is central to seeing that the corporate risk profile is managed in a manner consistent with KeyCorp's risk appetite. The ERM Committee also is responsible for implementation of KeyCorp's Enterprise Risk Management Policy that encompasses KeyCorp's risk philosophy, policy framework, and governance structure for the management of risks across the entire company. The Risk Committee of the Board oversees KeyCorp's risk management program, including the ERM Committee. The Board of Directors approves the Enterprise Risk Management Policy and sets the overall level of risk KeyCorp is willing to accept and manage in pursuit of its strategic objectives.</p>
205-2	Communication and training about anti-corruption policies and procedures	<p>Each year, 100% of employees (including governance body members) are required to complete a Conduct and Ethics training course, pass an exam, and certify their compliance.</p>
205-3	Confirmed incidents of corruption and actions taken	<p>No reportable incidents of corruption activity.</p> <p>Key's Code of Ethics states that there is a zero-tolerance policy in response to incidents of corruption.</p>



Item	Description	Response
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Key Topics

Topic: Economic Performance

103-1	Explanation of the Material topic and its boundary	Pages 1-6 of 2017 Annual Report 2017 10-K Pages 4, 9 of 2017 CR Report
103-2	Explain management approach components	Pages 20-27 of 2017 10-K Key actively manages our strong reputation to drive peer leading financial performance. Aligned with our business strategy, we build meaningful client and community relationships to support sustained growth of the company. We engage in transparent marketing our products and services, and maintain a disciplined approach towards financial management and growth by maintaining a moderate risk-profile.
103-3	Evaluate management approach	2017 10-K 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 client focused objectives.
201-1	Direct economic value generated and distributed	Pages 4, 9, 27-29 of 2017 CR Report Page 8 of 2017 Annual Report Page 35 of 2017 10-K
201-2	Financial implications and other risks and opportunities for the organization's activities due to climate change	Pages 15-16, 31-38 of 2017 CR Report Page 23 of 2017 10-K Section C2 of 2018 CDP Response



Item	Description	Response
Topic: Environmental		
Effluents and Waste		
103-1	Explanation of the Material topic and its boundary	<p>Being primarily office space and bank branches, material waste components include paper waste, comingled office waste products, banking products, and e-waste. Water is not a material component in our operations or as part of our products and services. Because a material number of our facilities are leased and share water meters, it is not possible to meaningfully track our usages. However, our standard practices include: use of low or no irrigation, as well as low-flow fixtures.</p> <p>With the exception of construction waste, we actively track all material waste streams.</p> <p>Pages 32, 38 of 2017 CR Report</p> <p>Waste is not a material consideration of our products and services.</p> <p>https://www.key.com/html/bank-supplier-information.html</p>
103-2	Explain management approach components	<p>We have paper reduction goals and waste diversion goals which are tracked on a quarterly basis.</p> <p>By 2020, we have committed to 30% reduction of back office and retail paper usage over our 2014 baseline.</p> <p>75% waste to landfill diversion.</p> <p>Page 38 of 2017 CR Report</p>
103-3	Evaluate management approach	<p>We have paper reduction goals and waste diversion goals which are tracked on a quarterly basis.</p> <p>Current diversion rate is 67%</p> <p>We significantly increased the number of printers under management as part of the First Niagara acquisition, and have set a new baseline.</p> <p>Page 38 of 2017 CR Report</p>



Item	Description	Response
306-2	Waste by type and disposal method	<p>Page 38 of 2017 CR Report</p> <ul style="list-style-type: none">• Total recycled is 6,049• Total Landfill is 2,879• Total Waste is 8,928• Diversion rate is 67% <p>Hazardous waste represents a non-material amount of our waste streams. Third-party vendors dispose of waste on behalf of Key by certified companies. This number excludes bank equipment, as the vendor does not track diversion specific to Key Bank, but as part of their entire waste stream.</p> <p>A) Total weight of hazardous waste - 0 Total weight of non-hazardous waste - 8,928 tons</p> <p>Disposal methods</p> <ul style="list-style-type: none">i Reuse unable to be fully tracked under the reuse category, as reuse versus recycled are tracked under the same category. Reuse of bank equipment, furniture, and information technology assets are reused whenever feasibleii Comingled - 374 tonsiii Composting - 3 tonsiv Recovery - 0v Incineration - 0vi On-site storage - 0vii Other -<ul style="list-style-type: none">Repurposed furnishings - 88 tonse-waste - 12 tonsMetal - 10 tonsShredded paper - 5,460 tons <p>B) Our goal is to minimize the amount of waste goes to landfill. We prioritize waste management first by reducing waste through reuse or more efficient operations, donation/resale of assets, recycling, and the remaining waste goes to landfill.</p> <ul style="list-style-type: none">i Key directly measures resale of some assets and all donations to non-profitsii Contractors or landlords report shred, e-waste, metal, comingled, compost, and bank equipmentiii Defaults of our contractors align to our waste management priorities



Item	Description	Response
Emissions		
103-1	Explanation of the Material topic and its boundary	<p>Key measures and manages the emissions of our direct and indirect operational footprint and measures and reports Scope 1, 2 and 3 emissions annually through CDP. The boundary is our operational footprint based on operational control within our corporate and retail operations across the U.S.</p> <p>In addition, Key provides products and services that enhance our clients' efforts to improve efficiency, and to advance alternative energy. We provide lending and investment to the renewable energy industry and measure the impact of these investments. We promote the implementation of sustainability practices in client relationships and investments.</p> <p>We are committed to "doing our share" to mitigate the effects of climate change. As part of a real estate rebaselining process following the acquisition of First Niagara Bank, we set new operational GHG and Energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.</p> <p>At this time, guidance has not yet been released to account for emissions related to our products and services impacting "financed emissions".</p>
103-2	Explain management approach components	Pages 33-37 of 2017 CR Report
103-3	Evaluate management approach	Pages 33-37 of 2017 CR Report
305-1	Direct (Scope 1) GHG emissions	Sections C4.1a, C4.1b, c5.1, c5.2, c5.2a, 7.1a, 8.2d, c0.5, c6.1, c6.7, c6.7a, c7.2, c7.3, c7.3a, c7.3a, c7.3b, c7.3c, c7.3d of 2018 CDP Response. Page 36 of 2017 CR Report
305-2	Energy indirect (Scope 2) GHG emissions	Page 36 of 2017 CR Report See sections: c5.1, c5.2, c5.2a, c7.1a, c8.2d, c0.5, c6.2, c6.3, c7.5, c7.6, c7.6a, c7.6b, c7.6c of 2018 CDP Response
305-3	Other indirect (Scope 3) GHG emissions	Page 36 of 2017 CR Report See sections: c4.1a, c4.1b, c4.1a, c4.1b, c4.3, c4.3a, c4.3b, c4.3c, c4.3d, c5.2, c5.2a, c6.5, c6.7, c6.7a, c7.1a, c7.9, c7.9a, c7.9b of 2018 CDP Response
305-5	Reduction of GHG emissions	Pages 35-36 of 2017 CR Report Questions 3.1, 3.1c, 3.1f, C4.5, C4.5a, C4.3, C4.3a, C4.3b, C4.3c, C4.3d, c5.2, c5.2a, c7.1a, c7.9, c7.9a, c7.9b of 2018 CDP Response



Item	Description	Response
Energy		
103-1	Explanation of the Material topic and its boundary	<p>Energy and energy use of our operations within the company owned and/or leased real estate footprint, energy use associated with business operations are considered within scope of the management approach of this material topic.</p> <p>In addition, Key provides products and services that enhance our clients' efforts to improve efficiency and to advance alternative energy. We promote the implementation of sustainability practices in client relationships and investments.</p> <p>With respect to our operations, a detailed description can be found on pages 33-37 of the 2017 CR Report</p>
103-2	Explain management approach components	<p>Pages 33-37 of 2017 CR Report</p> <p>Sections 1.1b, 1.2, 2, 3 of 2018 CDP Response</p>
103-3	Evaluate management approach	Pages 33-37 of 2017 CR Report
302-1	Energy consumption within the organization	<p>Page 36 of 2017 CR Report</p> <p>For a, b, c, e, g – Sections C7.5, C8.2a, C8.2c, C8.2a, C8.2f of 2018 CDP Response</p> <p>f) inclusive of most, but not all of our square footage based on utility bills. Excluded square footage is not material.</p>
302-2	Energy consumption outside of the organization	Section 6.5 of 2018 CDP Response
302-3	Energy intensity	Sections 4.2, 6.10, 9.1 of 2018 CDP Response
302-4	Reduction of energy consumption	<p>Pages 35, 36 of 2017 CR Report</p> <p>All of our direct and indirect energy reductions were due to facilities closures, relatively mild weather, and infrastructure improvements focused on energy efficiency.</p> <p>Sections C5, C3.1-C3.1e, and C4 of 2018 CDP Response</p>
302-5	Energy reductions in products and services	<p>Pages 15-16 of 2017 CR Report</p> <p>Sections C2 and C3 of 2018 CDP Response</p>



Item	Description	Response
Supplier Environmental Assessment		
103-1	Explanation of the Material topic and its boundary	<p>KeyBank engages with its supply chain on a wide range of environmental and social attributes to deepen our understanding on the supply chain and better manage risk and opportunities with the supply chain. Key Maintains a third-party supplier code of conduct that outlines supplier expectations for KeyBank suppliers.</p> <p>2016 was the first year Key's procurement team formally engaged our suppliers on sustainability topics via survey. We assessed our top 25 suppliers in terms of spend, and will be expanding the program annually.</p> <p>However, our Corporate Real Estate team has engaged suppliers on reporting expectations, disposal, and other sustainability measures supporting our goals since 2009.</p> <p>Pages 32, 35-38 of 2017 CR Report</p> <p>Section 12.1a of 2018 CDP Response</p>
103-2	Explain management approach components	<p>Pages 32, 35-38 of 2017 CR Report</p> <p>Section 12.1a of 2018 CDP Response</p>
103-3	Evaluate management approach	<p>Pages 32, 35-38 of 2017 CR Report</p> <p>Section 12.1a of 2018 CDP Response</p>
308-1	Percentage of new suppliers that were screened using environmental criteria	<p>We engaged our top 25 in terms of spend. In 2016, none of these were new suppliers.</p>
308-2	Negative environmental impacts in the supply chain and actions taken	<p>Zero</p> <p>Supplier Code of Conduct</p> <p>A) For the first time, we surveyed our top 25 suppliers in terms of spend about their environmental performance.</p> <p>B) As a bank, our exposure to significant environmental impacts as part of our operations is not a material risk.</p> <p>C) 0</p> <p>D) 0</p> <p>E) 0</p>



Item	Description	Response
Topic: Social		
Customer Privacy		
103-1	Explanation of the Material topic and its boundary	<p>Pages 8-11 of 2015 CR Report</p> <p>In 2015, Key completed an 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.</p> <p>Client privacy and data security was one of the ten material topics identified.</p> <p>This includes all 3 million of KeyBank's clients.</p>
103-2	Explain management approach components	<p>Data privacy, including cyber security, is embedded within our enterprise-wide approach to risk management. It remains one of our highest priorities and top areas of focus and investment. The Risk Committee of our Board of Directors has primary oversight responsibility for enterprise-wide risk at KeyCorp (including operational risk and cybersecurity). Our Board structure enables the Board to exercise vigorous oversight of key issues and actions taken to mitigate risks. Because a significant portion of our operations relies on the secure processing, storage, and transmission of personal and confidential information, cybersecurity experience is an important skill that we value in our directors – 10 of our 16 directors have experience related to cyber security (per our most recent proxy statement). The Risk Committee of our Board meets frequently (8 risk committee meetings in 2017) with the full Board of Directors remaining apprised of cyber security and data privacy through an annual strategic deep dive and more periodic updates and discussions as relevant and timely.</p>
103-3	Evaluate management approach	<p>Page 82 of 2017 10-K</p> <p>Key has formed a senior level management committee, the Enterprise Risk Management Committee, consisting of Beth Mooney, CEO and Chairman of the Board, and other senior officers at Key, including our Chief Risk Officer. The ERM Committee meets weekly and is central to seeing that the corporate risk profile is managed in a manner consistent with KeyCorp's risk appetite, and this includes cyber risk. The ERM Committee also is responsible for implementation of KeyCorp's Enterprise Risk Management Policy that encompasses KeyCorp's risk philosophy, policy framework, and governance structure for the management of risks across the entire company. The Risk Committee of the Board mentioned earlier oversees KeyCorp's risk management program, including the ERM Committee. The Board of Directors approves the Enterprise Risk Management Policy and sets the overall level of risk KeyCorp is willing to accept and manage in pursuit of its strategic objectives.</p> <p>Key maintains comprehensive Cyber Incident Response Plans, and it devotes significant time and resources to maintaining and regularly updating its technology systems and processes to protect the security of its computer systems, software, networks, and other technology assets against attempts by third parties to obtain unauthorized access to confidential information, destroy data, disrupt or degrade service, sabotage systems, or cause other damage.</p>



Item	Description	Response
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>Zero material breaches</p> <p>Page 82 of 2017 10-K</p> <p>KeyBank and many other U.S. financial institutions have experienced distributed denial-of-service attacks from technologically sophisticated third parties. These attacks are intended to disrupt or disable online banking services and prevent banking transactions. Key also periodically experiences other attempts to breach the security of its systems and data. These cyberattacks have not, to date, resulted in any material disruption of the company's operations or material harm to its customers and have not had a material adverse effect on Key's results of operations.</p> <p>To learn more information about any claims, please see our KeyBank Public File.</p>

Diversity and Equal Opportunity

103-1	Explanation of the Material topic and its boundary	<p>Pages 7, 19-24 of 2017 CR Report</p> <p>https://www.key.com/about/corporate-responsibility/diversity-and-inclusion.jsp</p> <p>https://www.key.com/about/corporate-responsibility/kbings.jsp</p> <p>https://www.key.com/about/careers/working-with-us/military-veterans.jsp</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. 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 members comprised of cross functional leaders across the enterprise.</p>
103-2	Explain management approach components	<p>Pages 7, 19-24 of 2017 CR Report</p> <p>www.key.com/about/community/diversity-and-inclusion.jsp</p> <p>The Council's Line of Business diversity champions represent all of KeyBank's major business organizations and each champion is appointed by the respective ELT leader. Each Line of Business develops action plans to pursue areas of opportunity.</p> <p>In addition to internal analytics, we respond to and are compared to other organizations by neutral third parties.</p>



Item	Description	Response
103-3	Evaluate management approach	<p>Our Diversity and Inclusion Council meets on a quarterly basis for learning opportunities and reporting on Key's progress towards a more diverse and inclusive workforce. In addition to internal analytics, we respond to and are compared to other organizations by neutral third parties focused on Diversity & Inclusion. We are proud to have been named for the eighth time, to <i>DiversityInc</i> magazine's Top 50 Companies for Diversity, based on excellence in benchmarks for equitable talent development, talent pipelines, CEO and leadership commitment, and supplier diversity.</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 and serves diverse communities. Key was also named, for the tenth time, to the Human Rights Campaign's Best Places to Work for LGBT Equality – earning a perfect score of 100.</p> <p>Page 40 of 2017 CR Report for additional awards and accolades</p>
405-1	Diversity of governance bodies and employees	<p>Page 21 of CR Report</p>

Employment

103-1	Explanation of the Material topic and its boundary	<p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 7, 19-24, 30, 34 of 2017 CR Report</p> <p>This is inclusive of all Key employees.</p>
103-2	Explain management approach components	<p>https://www.key.com/about/careers.jsp</p> <p>https://www.key.com/about/careers/working-with-us/work-life-balance.jsp</p>

Local Communities

103-1	Explanation of the Material topic and its boundary	<p>Inclusive of our footprint.</p> <p>Pages 4, 8-12, 14, 26-30 of 2017 CR Report</p>
103-2	Explain management approach components	<p>Pages 4, 8-12, 14, 26-30 of 2017 CR Report</p>
103-3	Evaluate management approach	<p>Pages 4, 8-12, 14, 26-30 of 2017 CR Report</p>
413-1	Operations with local community engagement, impact assessments, and development programs	<p>Pages 7-14, 17, 25-32 of 2017 CR Report</p>



Item	Description	Response
Marketing and Labeling		
417-3	Incidents of non-compliance concerning marketing communications	Zero To learn more information about any claims, please see our KeyBank Public File .
Public Policy		
103-1	Explanation of the Material topic and its boundary	Page 19 of 2018 Proxy Statement Statement of Political Activity
103-2	Explain management approach components	Page 19 of 2018 Proxy Statement Statement of Political Activity
103-3	Evaluate management approach	Page 19 of 2018 Proxy Statement Statement of Political Activity
415-1	Political contributions	Page 19 of 2018 Proxy Statement Statement of Political Activity
Social Supplier Assessment		
103-1	Explanation of the Material topic and its boundary	All suppliers are invited to declare whether they are a diverse-owned company. Additionally, they are requested to report Tier II, or their spend, with diverse-owned companies. Supplier Code of Conduct Pages 25, 32 of 2017 CR Report
103-2	Explain management approach components	https://www.key.com/about/company-information/suppliers/key-supplier-commitment.jsp https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp
103-3	Evaluate management approach	Pages 25, 32 of 2017 CR Report Supplier Code of Conduct



Item	Description	Response
414-2	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	Zero Supplier Code of Conduct

Training and Education

103-1	Explanation of the Material topic and its boundary	All employees receive some training each year, including mandatory training in topics such as ethics and compliance. Mentoring and career development training is available to all employees. https://www.key.com/about/careers/career-development.jsp Page 23 of 2017 CR Report
103-2	Explain management approach components	https://www.key.com/about/careers/career-development.jsp Page 23 of 2017 CR Report
103-3	Evaluate management approach	https://www.key.com/about/careers/career-development.jsp Page 23 of 2017 CR Report
404-3	Percentage of employees receiving regular performance and career development reviews	100%