



KeyCorp 2018 GRI Index

This Content Index is a complement to KeyCorp's 2018 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.](https://key.com/crreport)

Feedback: KeyCorp's 2018 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 Eric Fiala, KeyCorp's Director of Corporate Community Initiatives and Relations: Eric_M_Fiala@keybank.com or 216-689-4238.



Item	Description	Response
General Disclosures		
Organizational Profile		
102-1	Name of the organization	KeyCorp (Key) Page 1 of 2018 10-K
102-2	Activities, brands, products, and services	Pages 3-6 of 2018 CR Report Page 6 of 2018 10-K Key may not offer some products and services in certain markets based on state and local laws or restrictions of such products and services. Key maintains a list of prohibited and restricted industries. Key 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. This list is not publicly available.
102-3	Location of headquarters	Cleveland, OH Page 1 of 2018 10-K
102-4	Location of operations	All major operations are located within the United States of America. Page 3 of 2018 CR Report Page 7 of 2018 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 6-7 of 2018 10-K
102-6	Markets served	Pages 3-6 of 2018 CR Report Pages 6-7 of 2018 10-K
102-7	Scale of the organization	Pages 3-6 of 2018 CR Report Pages 6-7 of 2018 10-K
102-8	Information on employees and other workers	Pages 19-21 of 2018 CR Report Pages 2, 5, 9-10, 19 of 2018 Diversity & Inclusion Annual Report

Item	Description	Response
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 page 3 of our 2018 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, pages 2-3, 5, 15, and 18 of our 2018 Diversity & Inclusion Annual Report.</p>
102-10	Significant changes to the organization and its supply chain	<p>After a remarkable career that spanned nearly three decades with KeyBank, Head of Corporate Responsibility and Executive Vice President Bruce Murphy retired on July 1, 2018. Murphy left an indelible impact on this company and in the communities we serve, while strengthening KeyBank's brand as both a responsible bank and responsible citizen.</p> <p>Assuming this role following Murphy's retirement is Don Graves. Graves joined Key in April 2017 as senior director of corporate community initiatives & relations. In this role he worked to integrate Key's strategies between community outreach efforts and public officials, trade groups and agencies that support the opportunities and obligations of the National Community Benefits Plan. Graves has built relationships with targeted legislative and agency leaders and community leaders at national, state and local levels and worked to connect Key's capabilities with agencies in support of the plan to create value for both our company and the communities we serve.</p> <p>KeyBank announced that it has entered into a definitive agreement to sell Key Insurance & Benefits Services Inc. to USI Insurance Services. KeyBank acquired Key Insurance & Benefits Services, Inc. as part of the 2016 merger with First Niagara Financial Group.</p> <p>KeyBank and Laurel Road Bank have entered into a definitive agreement for the acquisition by Key of Laurel Road's digital lending business; Laurel Road's three bank branches located in southeast Connecticut are not part of this transaction. Through the acquisition, Key will enhance its digital capabilities with state-of-the-art, customer-centric technology, and will leverage Laurel Road's proven ability to attract and serve professional millennial clients.</p> <p>Laurel Road, based in New York City, has built a best-in-class student loan refinancing platform, which launched in 2013 and has grown rapidly, totaling more than \$4 billion in loan originations to date. The end-to-end consumer lending platform offers a streamlined, transparent experience with customized loan products. In 2018, the company introduced an innovative platform for mortgages using the same secure lending technology to offer home buyers and owners a streamlined experience, from application to payment.</p>
102-11	Precautionary principle or approach	<p>Key does not address the precautionary principle.</p> <p>For additional details regarding our approach to risk management and product development related to climate change, see sections C2.2, C2.3 of our 2019 CDP Response. For information regarding development and introduction of products and services, see section C2.4 of our 2019 CDP Response.</p>
102-12	External initiatives	<p>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.</p> <p>"Catalyst CEO Champions For Change" is a group of 50+ CEOs pledging to advance more women into all levels of leadership.</p> <p>For information about additional external initiatives, please see page 20 of the 2018 Diversity & Inclusion Annual Report.</p>
102-13	Membership of associations	<p>Key is active in chambers of commerce across our operating footprint, including the Greater Cleveland Partnership in our headquarters location of Cleveland, OH.</p> <p>We also view our participation in the following organizations as strategic to advancing our corporate responsibility efforts, including: National Community Reinvestment Coalition, Bankers Collaborative, Philanthropy Ohio, Financial Services Roundtable, Boston College Center of Corporate Citizenship, CDP, DiversityInc, HRC, American Council of Renewable Energy (ACORE), Consumer Bankers Association, National Multifamily Housing, Equipment Leasing and Financing Association, National Association of Affordable Housing, The Financial Health Network, The Economic Innovation Group, and The Conference Board.</p> <p>Question 12.3e of 2018 CR Report</p> <p>Page 20 of 2018 Diversity & Inclusion Annual Report</p>

Item	Description	Response
Strategy		
102-14	Statement from senior decision-maker	Page 5, 25 of 2018 CR Report
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. 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>Sections C2, C3, C4, C7 of 2019 CDP response</p> <p>Pages 6, 13-14, 19-20, 23 of 2018 CR Report</p> <p>Pages 2, 10-11 of 2018 Diversity & Inclusion Annual Report</p> <p>Page 8 of 2016 CR Report</p> <p>Pages 23-34 of 2018 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.</p> <p>To learn more about our commitment, please see our 2019 Code of Business Conduct and Ethics.</p> <p>Corporate Governance Guidelines</p> <p>Supplier Code of Conduct</p>

Item	Description	Response
Governance		
102-18	Governance structure	<p>Effectively managing Key's corporate responsibility priorities is essential to fulfilling our purpose to help clients and communities thrive. The Nominating and Corporate Governance Committee of the Board is charged with leading enterprise efforts to advance corporate responsibility at Key.</p> <p>In addition to the Nominating and Corporate Governance Committee, a Corporate Responsibility Council, comprised of senior leaders across the enterprise, provides additional oversight of our Corporate Responsibility activities, which includes our approach to addressing climate change risks and opportunities.</p> <p>See Key's Corporate Governance page</p> <p>Corporate Governance Guidelines</p> <p>Pages iv, 11-18 of 2019 Proxy Statement</p> <p>Page 174 of 2018 10-K</p> <p>Page 13 of 2019 Proxy Statement</p> <p>Nominating and Corporate Governance Committee Charter</p>
102-19	Delegating authority	<p>Key's Corporate Responsibility Group, led by Head of Corporate Responsibility & Community 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>The Nominating and Corporate Governance Committee of the Board of Directors is charged with providing guidance on board and corporate governance issues including recommending to the Board corporate governance guidelines applicable to the Corporation; and overseeing the Corporation's policies and practices on significant issues of corporate social responsibility, including sustainability, community and governmental relations, charitable and political contributions, community development and reinvestment act activities, and fair and responsible treatment of consumer clients. Our Head of Corporate Responsibility meets with this Committee annually.</p> <p>Our Head of Corporate Responsibility & Community Relations reports to our Director of Corporate Center, who reports to our CEO Beth Mooney. Our Head of Corporate Responsibility & Community Relations meets with the Nominating and Governance Committee of the Board of Directors annually.</p> <p>Corporate responsibility and enterprise progress is advised by Key's Corporate Responsibility (CR) Council, chaired by the Vice Chairman and President of Banking and comprised of senior leaders across the enterprise. They council serves as a way to communicate our priorities and CR progress internally to accelerate efforts at Key.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>Key's Corporate Responsibility Group, led by Head of Corporate Responsibility & Community 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>The Nominating and Corporate Governance Committee of the Board of Directors is charged with providing guidance on board and corporate governance issues including recommending to the Board corporate governance guidelines applicable to the Corporation; and overseeing the Corporation's policies and practices on significant issues of corporate social responsibility, including sustainability, community and governmental relations, charitable and political contributions, community development and reinvestment act activities, and fair and responsible treatment of consumer clients. Our Head of Corporate Responsibility & Community Relations meets with this Committee annually.</p> <p>Our Head of Corporate Responsibility & Community Relations reports to our Director of Corporate Center, who reports to our CEO Beth Mooney. Our Head of Corporate Responsibility & Community Relations meets with the Nominating and Governance Committee of the Board of Directors annually.</p> <p>Corporate responsibility and enterprise progress is advised by Key's Corporate Responsibility (CR) Council, chaired by the Vice Chairman and President of Banking and comprised of senior leaders across the enterprise.</p>

Item	Description	Response
102-21	Consulting stakeholders on economic, environmental, and social topics	Pages 17-18 of 2019 Proxy Statement
		Page 7, 18 of 2017 CR Report
		Investor Relations contact information
		Key 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. 2017 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 expanded to the top 50 in 2018.
102-22	Composition of the highest governance body and its committees	Pages 3-18 of 2019 Proxy Statement Page 2 of 2018 Diversity & Inclusion Annual Report Diversity and Inclusion Page 20 of 2018 CR Report
102-23	Chair of the highest governance body	Beth E. Mooney serves as KeyCorp's Chairman of the Board and Chief Executive Officer. Pages 11-12 of 2019 Proxy Statement
102-24	Nominating and selecting the highest governance body	Pages 1-10 of 2019 Proxy Statement Nominating and Corporate Governance Committee Charter
102-25	Conflicts of interest	Pages 16-17 of 2019 Proxy Statement
102-28	Evaluating the highest governance body's performance	Page 13 of 2019 Proxy Statement Key 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 2019 Proxy Statement Sections C1.1-C1.2a, C2, C3 of 2019 CDP Response Pages 9, 20 of 2018 Diversity and Inclusion Annual Report Pages 6, 20 of 2018 of CR Report

Item	Description	Response
102-31	Review of economic, environmental, and social topics	Pages 26-28, 32 of 2018 10-K Sections C1.1-C1.2a, C2, C3 of 2019 CDP Response
102-33	Communicating critical concerns	Page 18 of 2019 Proxy Statement
102-37	Stakeholders involvement in remuneration	Pages 17-18, 36 of 2019 Proxy Statement Pages 7, 18 of 2017 CR Report Page 6 of 2018 CR Report

Stakeholder Engagement

102-40	List of stakeholder groups	Groups include: • Employees • Suppliers • Shareholders • Clients • Regulators • Communities 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 18, 25, 30, 32 of 2017 CR Report Page 6 of 2018 CR Report Pages 2, 9-11 of 2018 Diversity & Inclusion Annual 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, through the National Community Benefits plan, we identified organizations to serve on both a national and three local Community Advisory Councils to monitor Key's progress against the plan.

Item	Description	Response
102-43	Approach to stakeholder engagement	<p>Pages 18, 32 of 2017 CR Report</p> <p>Pages 6, 10, 12-17, 19, 21-23 of 2018 CR Report</p> <p>Pages 2, 9-12, 15 of 2018 Diversity & Inclusion Annual Report</p> <p>Section C12: Questions C2.2b, C2.2c, C2.5, C3.1c, C4.3c of 2019 CDP Response</p> <p>Pages iv, 11-19, 35-36 of 2019 Proxy Statement</p> <p>National Community Benefits Plan</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: 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, town halls, and established a National Community Advisory Council and three Local Community Advisory Councils that meet 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 <p>Employees and suppliers who are featured, review, approve, or supply data for our CR reporting are engaged in the reporting process.</p>
102-44	Key topics and concerns raised	<p>Page 8 of 2017 CR Report</p> <p>Pages 6, 8-10, 12-16, 19-20, 22-23 of 2018 CR Report</p> <p>National Community Benefits Plan</p> <p>Pages 5, 9-13, 15, 19 of 2018 Diversity & Inclusion Annual Report</p> <p>We report performance against the National Community Benefits Plan, environmental, social and governance topics, philanthropic support, and community engagement.</p> <p>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 stakeholder's concerns.</p> <p>Comments emailed or written are stored in the Company's public file which is available upon request.</p>

Item	Description	Response
Reporting Practice		
102-45	Entities included in the consolidated financial statements	<p>Pages 4-5 of 2018 10-K Page 3 of 2018 CR Report</p> <p>This report covers all entities included in our 2018 10-K.</p>
102-46	Defining report content and topic boundaries	<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 priorities were identified as essential to the bank to successfully manage in order to retain the right to conduct business. The other six were identified as differentiators for Key.</p> <p>The four priorities 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 <p>We report performance against the National Community Benefits Plan, environmental, social and governance topics, philanthropic support and community engagement.</p>

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 priorities were identified as essential to the bank to successfully manage in order to retain the right to conduct business. The other six were identified as differentiators for Key.</p> <p>The four priorities 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 <p>We report performance against the National Community Benefits Plan, environmental, social and governance topics, philanthropic support and community engagement.</p>
102-48	Restatements of information	None
102-49	Changes in reporting	None
102-50	Reporting period	This report covers the calendar year 2018.
102-51	Date of most recent report	Previous report covered calendar year 2017.
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Page 2 of 2018 CR Report

Item	Description	Response
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: core option.
102-55	GRI Content Index	GRI Content Index
		Page 2 of 2018 CR Report
		Section C10 of 2019 CDP Response
102-56	External assurance	<p>The content of this report is reviewed internally with subject matter experts, business and executive leadership, including the CEO, 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 an 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		
		Pages 23-34 of 2018 10-K
205-1	Operations assessed for risks related to corruption	<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 generally meets on a weekly basis and is central to seeing that the corporate risk profile is managed in a manner consistent with Key's approved risk appetite. The ERM Committee also is responsible for implementation of Key's Enterprise Risk Management Policy that encompasses Key's risk philosophy, policy framework, and governance structure for the management of risks across the entire company. The Risk Committee of the Board oversees Key'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 Key is willing to accept and manage in pursuit of its strategic objectives.</p>
205-2	Communication and training about anti-corruption policies and procedures	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.

Item	Description	Response
205-3	Confirmed incidents of corruption and actions taken	No reportable incidents of corruption activity. Key's 2019 Code of Business Conduct and Ethics states that there is a zero-tolerance policy in response to incidents of corruption.

Key Topics

Topic: Economic Performance

103-1	Explanation of the material topic and its boundary	Pages 0, 8 of 2018 Annual Report 2018 10-K Pages 3, 6 of 2018 CR Report Pages 9-11 of 2015 CR Report
103-2	Explain management approach components	Pages 23-33 of 2018 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 of our products and services and maintain a disciplined approach towards financial management and growth by maintaining an approved risk-profile.
103-3	Evaluate management approach	2018 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 3, 6, 8-10, 12-14, 22 of 2018 CR Report National Community Benefits Plan Employee Benefits and Programs Pages 1-2, 8 of 2018 Annual Report Page 36 of 2018 10-K

Item	Description	Response
201-2	Financial implications and other risks and opportunities for the organization's activities due to climate change	Pages 13-14, 23 of 2018 CR Report Page 28 of 2018 10-K Sections C1, C2, C3, C4, C12; Question C9.1 of 2019 CDP Response

Topic: Environmental

Effluents and Waste

103-1	Explanation of the material topic and its boundary	<p>As primarily office space and bank branch occupants, material waste components include paper waste, comingled office waste products, banking products, and e-waste.</p> <p>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 usage. However, our standard practices include use of low or no irrigation and low flow fixtures.</p> <p>With the exception of construction waste, we actively track all material waste streams.</p> <p>Page 23 of 2018 CR Report</p> <p>Waste is not a material consideration of our products and services.</p>
103-2	Explain management approach components	<p>We closely track paper reduction and waste diversion which are monitored and reported on a quarterly basis.</p> <p>With the acquisition of First Niagara Financial Group, a new baseline was set for both paper and waste, as these streams were integrated into our tracking and reporting. We work closely with our waste management, print technology, and lines of business to continually decrease waste to landfill and use of paper.</p> <p>To reduce paper use, we have implemented technological interventions and improvements, as well as employee education and engagement.</p> <p>To minimize waste to landfill, we reuse whenever feasible, implement processes and policies which include recycling waste, and donate to our local communities. We encourage behavior change through employee engagement and educational programming.</p> <p>Page 15 of 2018 CR Report</p> <p>Page 3 of KeyBank Supplier Code of Conduct</p>

Item	Description	Response
103-3	Evaluate management approach	<p>We closely track paper reduction and waste diversion, which are monitored and reported on a quarterly basis.</p> <p>Diversion rate was 46%.</p> <p>Paper reduction was 6.4% year over year.</p> <p>Page 23 of 2018 CR Report</p> <p>Page 15 of 2018 Diversity & Inclusion Annual Report</p>
306-2	Waste by type and disposal method	<p>Page 15 of 2018 CR Report</p> <ul style="list-style-type: none"> • Total recycled is 4830 • Total landfill is 2879 • Total waste is 10,512 • Diversion rate is 46% <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.</p> <p>This number excludes bank equipment, as the vendor does not track diversion specific to Key, but as part of their entire waste stream. Total weight of hazardous waste - 0.</p> <ul style="list-style-type: none"> • Total weight of non-hazardous waste – 10,512 tons <p>Disposal methods</p> <p>i) Reuse is unable to be fully tracked under the reuse category, as reuse versus recycled are tracked under the same data collection category. Bank equipment, furniture, and information technology assets are repurposed whenever feasible</p> <p>ii) Comingled - 352 tons</p> <p>iii) Composting - 21 tons</p> <p>iv) Recovery - 0</p> <p>v) Incineration - 0</p> <p>vi) On-site storage - 0</p> <p>vii) Other -</p> <ul style="list-style-type: none"> Repurposed furnishings - 16 tons Electronic waste - 22 tons Metal - 155 tons Shredded paper - 4,255 tons Lights/ballasts - 10 tons <p>b) Our goal is to minimize the amount of waste that goes to landfill. We prioritize waste management first by reducing waste through reuse or more efficient operations, donation/resale of assets, recycling, and then the remaining waste goes to landfill.</p> <p>i) Key directly measures resale of some assets and all donations to non-profits</p> <p>ii) Contractors or landlords report shred, e-waste, metal, comingled, compost, and bank equipment</p> <p>iii) Default contracts with our contractors align to our waste management priorities</p>

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>At this time, guidance has not yet been released to account for emissions related to our products and services impacting “financed emissions.”</p> <p>Pages 3, 23 of 2018 CR Report</p>								
103-2	Explain management approach components	<p>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 supplier and client relationships and investments.</p> <p>We are committed to “doing our share” to mitigate the effects of our operations on climate change. As part of a real estate re-baselining process following the acquisition of First Niagara Bank in 2016, we set new operational GHG and Energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.</p> <p>Sections C1, C4, C6, C7, C9, C12; Question C2.2c of 2019 CDP Response</p> <p>Page 3 of Supplier Code of Conduct</p> <p>Page 23 of 2018 CR Report</p>								
103-3	Evaluate management approach	<p>Page 23 of 2018 CR Report</p> <p>Sections C1, C4, C6, C7, C9, C12; Question C2.2c of 2019 CDP Response</p> <p>We are on track meet our 2030 and 2050 emissions reductions goals.</p> <p>To date, we have not invested a material amount in renewable energy. We are in process of evaluating options to increase renewable energy investments.</p>								
305-1	Direct (Scope 1) GHG emissions	<table><tr><td></td><td>2016</td><td>2017</td><td>2018</td></tr><tr><td>Metric tons CO2e</td><td>13,719</td><td>13,670</td><td>14,525</td></tr></table> <p>Sections C5, C6, C7, C8, C9, C12; Question C.5 of 2019 CDP Response</p> <p>Page 23 of 2018 CR Report</p> <p>As part of a real estate re-baselining process following the acquisition of First Niagara Financial Group in 2016, we set new operational GHG and energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.</p>		2016	2017	2018	Metric tons CO2e	13,719	13,670	14,525
	2016	2017	2018							
Metric tons CO2e	13,719	13,670	14,525							

Item	Description	Response								
305-2	Energy indirect (Scope 2) GHG emissions	<table><tr><td></td><td>2016</td><td>2017</td><td>2018</td></tr><tr><td>Metric tons CO2e</td><td>49,820</td><td>47,273</td><td>45,903</td></tr></table>		2016	2017	2018	Metric tons CO2e	49,820	47,273	45,903
			2016	2017	2018					
		Metric tons CO2e	49,820	47,273	45,903					
Sections C5, C6, C7, C8, C9, C12; Question C.5 of 2019 CDP Response Page 23 of 2018 CR Report As part of a real estate re-baselining process following the acquisition of First Niagara Financial Group in 2016, we set new operational GHG and energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.										
305-3	Other indirect (Scope 3) GHG emissions	<table><tr><td></td><td>2016</td><td>2017</td><td>2018</td></tr><tr><td>Metric tons CO2e</td><td>65,508</td><td>67,803</td><td>4,158,651</td></tr></table>		2016	2017	2018	Metric tons CO2e	65,508	67,803	4,158,651
			2016	2017	2018					
		Metric tons CO2e	65,508	67,803	4,158,651					
<p>Increase due to more comprehensive data collection in our supply chain. The majority of the emissions increase is related to the new inclusion of armored truck services and other transportation of materials related to essential business operations.</p> Sections C5, C6, C7, C8, C9, C12; Questions C.5 of 2019 CDP Response Page 23 of 2018 CR Report As part of a real estate re-baselining process following the acquisition of First Niagara Financial Group in 2016, we set new operational GHG and energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.										
305-4	GHG emissions intensity	0.0000093616 combined gross global Scope 1 and Scope 2 emissions per unit of currency. Which is a 3.1% reduction YOY.								
		0.006808147 combined gross global Scope 1 and Scope 2 emissions per square foot of real estate utilized. Which is a 3.37% reduction YOY.								
		Section C9; Question C6.10 of 2019 CDP Response								
305-5	Reduction of GHG emissions	Scope 1 metric tons CO2e increased 6.3%, increase likely due to improved data collection.								
		Scope 2 metric tons CO2e reduced 2.9%, due primarily to efficiencies in space utilization and capital improvement.								
		Combined Scope 1 and Scope 2 metric tons CO2e reduced .8%. Page 23 of 2018 CR Report Sections C4, C5, C9; Questions C3.1, C3.1c, C6.10, C7.1a, C7.9, C7.9a, C7.9b of 2019 CDP Response As part of a real estate re-baselining process following the acquisition of First Niagara Financial Group in 2016, we set new operational GHG and energy reduction goals aligned with guidelines set by Science Based Targets Initiative and World Resources Institute.								

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, 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 and vendor relationships and investments.</p> <p>Pages 3, 23 of 2018 CR Report</p> <p>Sections C.0, C4, C8, C12; Questions C2.2d, C3.1c of 2019 CDP Response</p>																
103-2	Explain management approach components	<p>Key uses a combination of capital investments and improvements, more efficient use of occupied real estate (employees per square foot), and employee engagement to reduce our energy use.</p> <p>Page 23 of 2018 CR Report</p> <p>Sections C1, C2, C3, C4, C8, C9, C12 of 2019 CDP Response</p>																
103-3	Evaluate management approach	<p>Page 23 of 2018 CR Report</p> <p>Sections C4, C8, C9, C12 of 2019 CDP Response</p>																
302-1	Energy consumption within the organization	<table><thead><tr><th></th><th>2016</th><th>2017</th><th>2018</th></tr></thead><tbody><tr><td>Direct Energy (GJ)</td><td>259,023</td><td>257,797</td><td>273,262</td></tr><tr><td>Indirect Energy (GJ)</td><td>502,385</td><td>472,407</td><td>461,428</td></tr><tr><td>Total (GJ)</td><td>761,408</td><td>730,204</td><td>734,690</td></tr></tbody></table> <p>Page 23 of 2018 CR Report</p> <p>A, B, C, E, G: Questions C7.5, c8.2a, C8.2c, C8.2a, C8.2f of 2019 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>		2016	2017	2018	Direct Energy (GJ)	259,023	257,797	273,262	Indirect Energy (GJ)	502,385	472,407	461,428	Total (GJ)	761,408	730,204	734,690
	2016	2017	2018															
Direct Energy (GJ)	259,023	257,797	273,262															
Indirect Energy (GJ)	502,385	472,407	461,428															
Total (GJ)	761,408	730,204	734,690															

Item	Description	Response
302-2	Energy consumption outside of the organization	Question C6.5 of 2019 CDP Response
302-3	Energy intensity	.0020 FTE employees per square foot. Representing an increase of 7.8%. This reflects the success of our optimization efforts as redundant buildings are vacated and condensed as part of the First Niagara Financial Group acquisition. Questions C4.2, C6.10, C9.1 of 2019 CDP Response
302-4	Reduction of energy consumption	Direct Energy use increased 6% YOY. Indirect Energy use decreased 2.3% YOY. Combined Direct and Indirect use increased .6%. Page 23 of 2018 CR Report All of our direct and indirect energy reductions were due to facilities closures, behavior change, and infrastructure improvements focused on energy efficiency. Sections C4, C5; Questions C3.1-C3.1e of 2019 CDP Response
302-5	Energy reductions in products and services	Pages 13-14 of 2018 CR Report Sections C2, C3 of 2019 CDP Response

Supplier Environmental Assessment

103-1	Explanation of the material topic and its boundary	<p>Key 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 Key suppliers.</p> <p>Supplier Code of Conduct</p> <p>2017 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 expanded to the top 50 in 2018.</p> <p>Our Corporate Real Estate team has engaged suppliers on reporting expectations, disposal, and other sustainability measures supporting our goals since 2009. Adding to these efforts, 2017 was the first year Key's procurement team formally engaged our top 25 (based on spend) suppliers on sustainability topics via survey. In 2018, we expanded this engagement to our top 50 most strategic suppliers.</p> <p>Section C12 of 2019 CDP Response</p>
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Item	Description	Response
103-2	Explain management approach components	<p>Page 23 of 2018 CR Report</p> <p>Section C12 of 2019 CDP Response</p> <p>In 2018, sustainability was represented, and vendors were engaged at our 2nd Annual KeyBank Supplier Summit. Sustainability is a topic measured and covered by our suppliers during scheduled quarterly business reviews.</p> <p>Page 15 of 2018 Diversity & Inclusion Annual Report</p>
103-3	Evaluate management approach	<p>Page 23 of 2018 CR Report</p> <p>Section C12; Questions C4.3a – C4.3b, C6.5 of our 2018 CDP Response</p>
308-1	Percentage of new suppliers that were screened using environmental criteria	100% of new suppliers were screened using environmental criteria. Beyond newly established supplier relationships, our standard RFP process includes questions related to environmental criteria.
308-2	Negative environmental impacts in the supply chain and actions taken	<p>Zero.</p> <p>Supplier Code of Conduct:</p> <p>a) In 2018, we surveyed our top 50 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>

Topic: Social

Customer Privacy		
103-1	Explanation of the material topic and its boundary	<p>Pages 8-11 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 Key's clients.</p>

Item	Description	Response
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 Key (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.</p> <p>Pages 15, 18 of 2019 Proxy Statement</p>
103-3	Evaluate management approach	<p>Pages 65-66, 79 of 2018 10-K Page 2, 15, 18 of 2019 Proxy Statement</p>
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>Zero material breaches.</p> <p>Key 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 Public File.</p>

Diversity and Equal Opportunity

103-1	Explanation of the material topic and its boundary	<p>https://www.key.com/about/corporate-responsibility/diversity-and-inclusion.jsp https://www.key.com/about/corporate-responsibility/kbings.jsp https://www.key.com/about/careers/working-with-us/military-veterans.jsp 2018 Diversity & Inclusion Annual 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 members comprised of cross functional leaders across the enterprise.</p>
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Item	Description	Response
103-2	Explain management approach components	<p>Pages 7, 19-21 of 2018 CR Report</p> <p>Pages 1-2, 4, 9-12, 14, 18, 20 of 2018 Diversity & Inclusion Annual 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 Key's major business organizations and each champion is appointed by their respective executive leadership team member. 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>
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.</p> <p>In addition to internal analytics, we respond to and are compared to other organizations by neutral third parties focused on diversity and inclusion. We are proud to have been named for the eighth time to Diversity Inc. 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>Pages 7, 19-21, 24 of 2018 CR Report</p> <p>Pages 2, 5-13, 19-21 of 2018 Diversity & Inclusion Annual 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 and serves diverse communities.</p>
405-1	Diversity of governance bodies and employees	<p>Pages 19-21 of 2018 CR Report</p> <p>Pages 1-2, 5-8, 14 2018 Diversity & Inclusion Annual 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>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> <p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 9-12, 14 of 2018 Diversity & Inclusion Annual Report</p> <p>Pages 3, 15, 17, 19-21 of 2018 CR Report</p>

Item	Description	Response
Local Communities		
103-1	Explanation of the material topic and its boundary	Inclusive of our operational footprint Pages 3, 6, 12, 15, 22, 24 of 2018 CR Report Pages 15 of 2018 Diversity & Inclusion Annual Report
103-2	Explain management approach components	Pages 6-17, 19, 22-23 of 2018 CR Report Pages 15-21 of 2018 Diversity & Inclusion Annual Report
103-3	Evaluate management approach	Pages 6-17, 19, 22-23 of 2018 CR Report Pages 15-21 of 2018 Diversity & Inclusion Annual Report
413-1	Operations with local community engagement, impact assessments, and development programs	Pages 6-17, 19, 22-23 of 2018 CR Report Pages 15-21 of 2018 Diversity & Inclusion Annual Report
Marketing and Labeling		
417-3	Incidents of non-compliance concerning marketing communications	Zero. To learn more information about any claims, please see our Public File .
Public Policy		
103-1	Explanation of the material topic and its boundary	Page 19 of 2019 Proxy Statement Statement of Political Activity
103-2	Explain management approach components	Page 19 of 2019 Proxy Statement Statement of Political Activity
103-3	Evaluate management approach	Page 19 of 2019 Proxy Statement Statement of Political Activity

Item	Description	Response
415-1	Political contributions	Page 19 of 2019 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
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 Page 22 of 2018 CR Report Pages 1-2, 15 of Diversity & Inclusion Annual Report https://www.key.com/about/security/privacy-security.jsp
103-3	Evaluate management approach	Page 22 of 2018 CR Report Supplier Code of Conduct Pages 1-2, 15 of Diversity & Inclusion Annual Report
414-1	New suppliers that were screened using social criteria	All new suppliers are screened using social criteria as part of the RFP/RFQ process. Suppliers determined to be strategic partners or of sufficient size are asked to report on supplier diversity in their supply chain. When applicable, they must show security controls and relevant certifications are in place to protect customer privacy and data. Page 22 of 2018 CR Report Page 15 of Diversity & Inclusion Annual Report https://www.key.com/about/company-information/suppliers/key-supplier-commitment.jsp https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp https://www.key.com/about/security/privacy-security.jsp

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	<p>All employees receive some training each year, including mandatory training in topics such as ethics and compliance.</p> <p>Mentoring and career development training is available to all employees.</p> <p>https://www.key.com/about/careers/career-development.jsp</p> <p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 1-2, 5, 9-12, 14 of 2018 Diversity & Inclusion Annual Report</p>
103-2	Explain management approach components	<p>https://www.key.com/about/careers/career-development.jsp</p> <p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 19-21 of 2018 CR Report</p> <p>Pages 1-2, 5, 9-12, 14 of 2018 Diversity & Inclusion Annual Report</p>
103-3	Evaluate management approach	<p>https://www.key.com/about/careers/career-development.jsp</p> <p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 19-21 of 2018 CR Report</p> <p>Pages 1-2, 5, 9-12, 14 of 2018 Diversity & Inclusion Annual Report</p>
404-2	Programs for upgrading employee skills and transition assistance programs	<p>https://www.key.com/about/careers/career-development.jsp</p> <p>https://www.key.com/about/careers/working-with-us/benefits.jsp</p> <p>Pages 19-21 of 2018 CR Report</p> <p>Pages 1-2, 5, 9-12, 14 of 2018 Diversity & Inclusion Annual Report</p> <p>We do not currently have a program designed to recruit women returning to the workforce after taking a career break.</p>
404-3	Percentage of employees receiving regular performance and career development reviews	100%

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