



# KeyCorp 2019 GRI Index

This Content Index is a complement to KeyCorp's 2019 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 2019 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 SVP & Head of Corporate Responsibility and Community Relations: [eric\\_m\\_fiala@key.com](mailto:eric_m_fiala@key.com) or 216-689-4238.



Item	Description	Response
<b>General Disclosures</b>		
<b>Organizational Profile</b>		
102-1	Name of the organization	KeyCorp (Key) <a href="#">Page 1 of 2019 10-K</a>
102-2	Activities, brands, products, and services	<a href="#">Pages 3, 5-6, 10 of 2019 CR Report</a> <a href="#">Page 6 of 2019 10-K</a> 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 <a href="#">Page 1 of 2019 10-K</a>
102-4	Location of operations	All major operations are located within the United States of America. <a href="#">Page 3 of 2019 CR report</a> <a href="#">Page 6 of 2019 10-K</a>
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. <a href="#">Pages 6-7 of 2019 10-K</a>
102-6	Markets served	<a href="#">Pages 3-6, 10 of 2019 CR Report</a> <a href="#">Pages 6-7 of 2019 10-K</a>
102-7	Scale of the organization	<a href="#">Pages 3-6, 10 of 2019 CR Report</a> <a href="#">Pages 6-7 of 2019 10-K</a>
102-8	Information on employees and other workers	<a href="#">Pages 3, 25–26 of 2019 CR Report</a>

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 <a href="#">2019 CR Report</a>, our suppliers are highly concentrated in the United States.</p> <p>For information regarding our supplier diversity initiatives, please see pages 7, 9, 28, 31 of our <a href="#">2019 CR Report</a>, and <a href="http://www.key.com/about/company-information/supplier-diversity.jsp">www.key.com/about/company-information/supplier-diversity.jsp</a></p> <p>For information about our Sustainable Supply Chain efforts within our operations, please see page 32 of the <a href="#">2017 CR Report</a>.</p>
102-10	Significant changes to the organization and its supply chain	<a href="#">Page 8 of 2019 CR Report</a>
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, see questions C1.1, 1.2 and sections C2 and C3 of our <a href="#">2020 CDP response</a>.</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.</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>Key signed onto the Business Coalition for Equality Act (Human Rights Campaign) to support the same basic protections to LGBTQ people as are provided to other protected groups under federal law. We have signed onto CEO Action for Diversity and Inclusion to advance racial equity, and Paradigm for Parity to address the corporate gender gap.</p> <p>For information about additional external initiatives, please see page 20 of the <a href="#">2018 Diversity &amp; Inclusion Annual Report</a>.</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, National Association of Affordable Housing Lenders, 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 Council, Equipment Leasing and Financing Association, National Association of Affordable Housing, The Financial Health Network, The Economic Innovation Group, and The Conference Board.</p> <p>Also, we are members of:</p> <ul style="list-style-type: none"> <li>• Catalyst</li> <li>• Executive Leadership Council</li> <li>• National Center for American Indian Enterprise Development</li> <li>• National Minority Supplier Development Council</li> <li>• National Organization on Disability</li> </ul> <p><a href="#">Question 12.3e of 2020 CDP Response</a></p>

Item	Description	Response
<b>Strategy</b>		
102-14	Statement from senior decision-maker	<a href="#">Pages 5, 9, 32 of 2019 CR Report</a>
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 in managing the bank’s CR performance.</p> <p>Of the 10 crucial topics, we identified four necessities required for us to retain the right to conduct business. They are:</p> <ul style="list-style-type: none"> <li>• Client Privacy and Data Security</li> <li>• Ethics, Compliance, and Risk Management</li> <li>• Fair &amp; Transparent Client Experience</li> <li>• Reputation &amp; Financial Performance</li> </ul> <p>Also, we focus on and have made significant progress on the following topics, which sets us apart from our peers; these topics include:</p> <ul style="list-style-type: none"> <li>• Diversity &amp; Inclusion</li> <li>• Economic Inclusion &amp; Community Vitality</li> <li>• Green Banking</li> <li>• Thriving Employees</li> <li>• Environmental Footprint</li> <li>• Supply Chain Practices</li> </ul> <p>Key is well-positioned to excel and has made progress on all 10 topics.</p> <p><a href="#">Sections C2, C3, C4, C7 of 2020 CDP Response</a></p> <p><a href="#">Pages 4, 6-7, 9-10, 16-20, 23-26, 29-30 of 2019 CR Report</a></p> <p><a href="#">Pages 23-33 of 2019 10-K</a></p>
<b>Ethics and Integrity</b>		
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 <a href="#">Code of Business Conduct and Ethics</a></p> <p><a href="#">Corporate Governance</a></p> <p><a href="#">Our Supplier Code of Conduct</a></p> <p><a href="#">Code of Business Conduct</a></p> <p><a href="#">Privacy</a></p>

Item	Description	Response
102-17	Mechanisms for advice and concerns about ethics	<p> <a href="#">Consumer Security</a>  <a href="#">Business Security</a>  <a href="#">Security Alerts</a>  <a href="#">Public Notices</a> </p> <p>An Ethics helpline is administered by an independent third party and is available 24 hours a day, 7 days a week. Employees complete annual ethics training and we require employees to report any possible ethics complaint to their manager or anonymously via the helpline. Employees will not be subject to retaliation for making a good faith report.</p> <p>The Chief Ethics Officer leads Key's Corporate Ethics Office, which is responsible for the administration of the KeyCorp Code of Business Conduct and Ethics and Key's Ethics Program, as well as ethics and conduct investigations.</p>
<b>Governance</b>		
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> <a href="#">See Key's Corporate Governance page</a>  <a href="#">Corporate Governance Guidelines</a>  <a href="#">Pages iii, 10-18 of the 2020 Proxy Statement</a>  <a href="#">Page 175 of 2019 10-K</a> </p>
102-19	Delegating authority	<p> <a href="#">Pages 14-15 of 2020 Proxy Statement</a>  <a href="#">Nominating and Corporate Governance Committee Charter</a> </p> <p>Key's Corporate Responsibility group, led by Head of Corporate Responsibility and Community Relations, oversees Key's CR strategy and initiatives and is responsible for ensuring Key continues its long-standing 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 and Community Relations meets with this Committee annually.</p> <p>Our Head of Corporate Responsibility and Community Relations reports to our Director of Corporate Center, who reports to our CEO. Our Head of Corporate Responsibility and Community Relations meets with the Nominating and Governance Committee of the Board of Directors annually.</p>

Item	Description	Response
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>Key's Corporate Responsibility Group, led by Head of Corporate Responsibility and Community Relations, oversees Key's CR strategy and initiatives and is responsible for ensuring Key continues its long-standing 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 and Community Relations meets with this Committee annually.</p> <p>Our Head of Corporate Responsibility and Community Relations reports to our Director of Corporate Center, who reports to our CEO. Our Head of Corporate Responsibility and Community Relations meets with the Nominating and Governance Committee of the Board of Directors annually.</p>
102-21	Consulting stakeholders on economic, environmental, and social topics	<p><a href="#">Pages iii, 16-17 of 2020 Proxy Statement</a></p> <p><a href="#">Pages 7, 10, 20, 28 of 2019 CR Report</a></p> <p><a href="#">Investor Relations contact information</a></p> <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.</p>
102-22	Composition of the highest governance body and its committees	<p><a href="#">Pages ii-iii, 1-2, 10-18 of 2020 Proxy Statement</a></p> <p><a href="#">Diversity and Inclusion</a></p> <p><a href="#">Pages 8-9, 25 of 2019 CR Report</a></p>
102-23	Chair of the highest governance body	<p>Beth E. Mooney served as KeyCorp's Chairman of the Board and Chief Executive Officer.</p> <p><a href="#">Page 10 of 2020 Proxy Statement</a></p>
102-24	Nominating and selecting the highest governance body	<p><a href="#">Pages 1-11 of 2020 Proxy Statement</a></p> <p><a href="#">Nominating and Corporate Governance Committee Charter</a></p>
102-25	Conflicts of interest	<p><a href="#">Pages iii, 10, 15-17 of 2020 Proxy Statement</a></p> <p><a href="#">Standards for Determining Independence of Directors</a></p>
102-26	Role of highest governance body in setting purpose, values, and strategy	<p><a href="#">Corporate Governance</a></p> <p><a href="#">Pages 66, 71, 72, 175 of 2019 10-K</a></p>

Item	Description	Response
102-27	Collective knowledge of the highest governance body	<p>Pages 11-14 of KeyCorp's <a href="#">2020 Proxy statement</a> details Board committees (incl. NCGC), committee breakouts, responsibilities, and Board assessment procedures.</p> <p>Page 17 of KeyCorp's <a href="#">2020 Proxy statement</a> details Board Education practices.</p> <p>The Nominating and Corporate Governance Committee has primary oversight responsibility for significant issues of corporate social responsibility.</p> <p>NCGC and Risk Committee charters available on <a href="#">IR website</a></p>
102-28	Evaluating the highest governance body's performance	<p><a href="#">Page 11 of 2020 Proxy Statement</a></p> <p><a href="#">Corporate Governance Information</a></p> <p><a href="#">Key Corporate Governance Guidelines</a></p> <p><a href="#">Nominating and Corporate Governance Committee Charter</a></p> <p><a href="#">Compensation and Organization Committee Charter</a></p>
102-29	Identifying and managing economic, environmental, and social impacts	<p><a href="#">Pages 11-18 of 2020 Proxy Statement</a></p> <p><a href="#">Sections C1, C2, C3 of 2020 CDP Response</a></p> <p><a href="#">Pages 6-7, 9, 17, 25, 27, 30 of 2019 CR Report</a></p>
102-30	Effectiveness of Risk Management processes	<p>"The Risk Committee is appointed by the Board of Directors of KeyCorp. Its sole and exclusive function is responsibility for the risk management policies of the Corporation and oversight of the operation of the Corporation's risk management framework. The Risk Committee is responsible for strategies, policies, procedures and practices relating to the assessment and management of the Corporation's enterprise-wide risk, including risks related to capital adequacy, capital planning, and capital actions."</p> <p><i>Risk Committee – KeyCorp Risk Committee Charter</i></p> <p><a href="#">Pages 23-33, 65-79 of 2019 10-K</a></p>
102-31	Review of economic, environmental, and social topics	<p><a href="#">Pages 25-27, 31-33 of 2019 10-K</a></p> <p><a href="#">Sections C1, C2, C3 of 2020 CDP Response</a></p> <p><a href="#">Pages 6-7, 9, 17, 25, 27, 30 of 2019 CR Report</a></p>
102-33	Communicating critical concerns	<p><a href="#">Page 17 of 2020 Proxy Statement</a></p> <p><a href="#">Investor Overview</a></p>



Item	Description	Response
102-35	Remuneration Policies	<a href="#">Pages iv, 15-16, and 22-56 of 2020 Proxy Statement</a> <a href="#">Section C1 of 2020 CDP Response</a>
102-36	Process for determining remuneration	<a href="#">Pages 22-30, 34-36 of 2020 Proxy Statement</a> <a href="#">KeyBank Pay Equity Commitment</a>
102-37	Stakeholders' involvement in remuneration	<a href="#">Pages 34-36 of 2020 Proxy Statement</a> <a href="#">Pages 7, 29 of 2019 CR Report</a> <a href="#">KeyBank Pay Equity Commitment</a>
102-38	Annual total compensation ratio	Ratio of 152:1 for former CEO and Chairman Beth Mooney (in office in FY19) can be found on <a href="#">page 53 of Key's 2020 Proxy Statement</a> . Detail of what is included in calculation is included in document.
102-39	Percentage increase in annual total compensation ratio	<p>Details of each year's calculation can be found in their respective proxy statements.</p> <p>2020: For fiscal 2019, the median of the annual total compensation of all employees, excluding the CEO, is \$63,748, calculated using the same methodology that we used to determine the annual total compensation of the CEO, as reported in the 2019 Summary Compensation Table ("SCT"). The annual total compensation of the CEO, as reported in the SCT, is \$9,663,988. The ratio of the annual total compensation of the CEO to the median of the annual total compensation of all other employees is 152 to 1. <a href="#">Page 53 of 2020 Proxy</a>.</p> <p>2019: The median of the annual total compensation of all employees, excluding the CEO, is \$62,853. The annual total compensation of the CEO, as reported in the 2018 Summary Compensation Table ("SCT"), is \$9,064,470. The ratio of the annual total compensation of the CEO to the median of the annual total compensation of all other employees is 144 to 1. <a href="#">Page 50 of 2019 Proxy</a>.</p> <ul style="list-style-type: none"> <li>- The ratio increased from 144:1 to 152:1, or roughly 5.6% (<math>152-144 = 8</math>; <math>8/144 = 5.6\%</math>)</li> <li>- Beth Mooney's annual comp increased ~6.6% YoY (<math>\\$9,663,988 - \\$9,064,470 / \\$9,064,470</math>)</li> <li>- Median employee comp increased ~1.4% YoY (<math>\\$63,748 - \\$62,853 / \\$62,853</math>)</li> </ul>

## Stakeholder Engagement

102-40	List of stakeholder groups	<p>Groups include:</p> <ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Shareholders</li> <li>• Clients</li> <li>• Regulators</li> <li>• Communities</li> </ul> <p><a href="#">Page 7 of 2019 CR Report</a></p>
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Item	Description	Response
102-41	Collective bargaining agreements	0%. Key does not have collective bargaining agreements.
102-42	Identifying and selecting stakeholders	<a href="#">Pages 6, 7, 9, 10, 17, 20 of 2019 CR Report</a> 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 a national and three local Community Advisory Councils to monitor Key's progress against the plan.
102-43	Approach to stakeholder engagement	<a href="#">Pages 6, 7, 9, 10, 17, 20 of 2019 CR Report</a> <a href="#">Section C2; Question C1.1b of 2020 CDP Response</a> <a href="#">Pages iv, 10-18, 34-36 of 2020 Proxy Statement</a> <a href="#">National Community Benefits Plan</a> 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: <b>Employees:</b> We host a voice of employee forum, an internal platform that allows for employees to make suggestions or comments to improve procedures for branches and contact centers. Also, we engage our employees via surveys, town halls, and performance reviews <b>Shareholders:</b> Quarterly earnings calls, annual shareholders' meeting, investor calls, and meetings <b>Clients:</b> multiple times annually – In-person, regular calls, emails, and surveys <b>Communities:</b> very frequent, but at minimum quarterly In-person meetings, relationship or financial wellness reviews, town halls, and established a National Community Advisory Council and three Local Community Advisory Councils that meet twice annually <b>Regulators:</b> at least quarterly – CRA and Compliance reviews, regular meetings <b>Suppliers:</b> For many of our largest suppliers – at least quarterly – In-person meetings, procurement procedures <b>Industry Associations:</b> 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	<a href="#">Pages 6, 7, 10, 16, 17, 20, 23-27, 29, 31 of 2019 CR Report</a> <a href="#">National Community Benefits Plan</a> 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 stakeholder's concerns. Comments emailed or written are stored in the Company's public file which is available upon request.

Item	Description	Response
<b>Reporting Practice</b>		
102-45	Entities included in the consolidated financial statements	<p><a href="#">Pages 6-7 of 2019 10-K</a></p> <p><a href="#">Page 3 of 2019 CR Report</a></p> <p>This report covers all entities included in our 2019 10-K.</p>
102-46	Defining report content and topic boundaries	<p><a href="#">Pages 8-11 of 2015 CR Report</a></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"> <li>• Client Privacy &amp; Data Security</li> <li>• Ethics, Compliance &amp; Risk Management</li> <li>• Fair &amp; Transparent Client Experience</li> <li>• Reputation &amp; Financial Performance</li> </ul> <p>Differentiator topics are:</p> <ul style="list-style-type: none"> <li>• Diversity &amp; Inclusion</li> <li>• Economic Inclusion &amp; Community Vitality</li> <li>• Environmental Footprint</li> <li>• Green Banking</li> <li>• Supply Chain Practices</li> <li>• Thriving Employees</li> </ul> <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><a href="#">Pages 8-11 of 2015 CR Report</a></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"> <li>• Client Privacy &amp; Data Security</li> <li>• Ethics, Compliance &amp; Risk Management</li> <li>• Fair &amp; Transparent Client Experience</li> <li>• Reputation &amp; Financial Performance</li> </ul> <p>Differentiator topics are:</p> <ul style="list-style-type: none"> <li>• Diversity &amp; Inclusion</li> <li>• Economic Inclusion &amp; Community Vitality</li> <li>• Environmental Footprint</li> <li>• Green Banking</li> <li>• Supply Chain Practices</li> <li>• Thriving Employees</li> </ul> <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 2019.
102-51	Date of most recent report	Previous report covered calendar year 2018.
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	<a href="#">Page 2 of 2019 CR Report</a>

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	<a href="#">GRI Content Index</a>  <a href="#">Page 2 of 2019 CR Report</a>  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.
102-56	External assurance	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.  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.  <a href="#">Section C10 of 2020 CDP Response</a>

## Management Approach Disclosures

Anti-Corruption		
		<a href="#">Pages 23-33 of 2019 10-K</a>  Compliance, operational and reputation Risks are material risks related to corruption or failure to operate in a responsible manner.
205-1	Operations assessed for risks related to corruption	Key has a senior level management committee, the Enterprise Risk Management (ERM) 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.
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 <a href="#">2019 Code of Business Conduct and Ethics</a> 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	<a href="#">Pages 0-8 of 2019 Annual Report</a> <a href="#">2019 10-K</a> <a href="#">Pages 6-7, 10 of 2019 CR Report</a> <a href="#">Pages 9-11 of 2015 CR Report</a>
103-2	Explain management approach components	<a href="#">Pages 34, 36, 42-45 of 2019 10-K</a> <p>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.</p>
103-3	Evaluate management approach	<a href="#">2019 10-K</a> <a href="#">Pages 3-7, 9-10, 12-14, 16-18, 20-21, 23-24, 28-29 of 2019 CR Report</a> <a href="#">National Community Benefits Plan</a> <a href="#">Employee Benefits and Programs</a> <a href="#">Pay Equity Commitment</a> <p>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.</p>

Item	Description	Response
201-1	Direct economic value generated and distributed	<a href="#">Pages 4-7, 10-14, 16-21, 28-29 of 2019 CR Report</a> <a href="#">National Community Benefits Plan</a> <a href="#">Pages 1-3, 6-7 of 2019 Annual Report</a> <a href="#">Pages 6, 36, 44-45, 90-95 of 2019 10-K</a>
201-2	Financial implications and other risks and opportunities for the organization's activities due to climate change	<a href="#">Pages 5, 7, 16, 23-24, 30 of 2019 CR Report</a> <a href="#">Pages 27-28 of 2019 10-K</a> <a href="#">Sections C1, C2, C3, C14; Questions C4.3a-4.3c, 4.5a of 2020 CDP Response</a>

## 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, 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><a href="#">Page 24 of 2019 CR Report</a></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>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><a href="#">Page 24 of 2019 CR Report</a></p> <p><a href="#">Page 3 of KeyBank Supplier Code of Conduct</a></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> <ul style="list-style-type: none"> <li>• Diversion rate was 30%</li> <li>• Waste reduction was 30%</li> <li>• Paper reduction was 18% year over year</li> </ul> <p><a href="#">Page 24 of 2019 CR Report</a></p> <p><a href="#">Section C12 of 2020 CDP Response</a></p>
306-2	Waste by type and disposal method	<p><a href="#">Page 24 of 2019 CR Report</a></p> <p>In tons:</p> <ul style="list-style-type: none"> <li>• Total recycled is 2,265</li> <li>• Total landfill is 5,104</li> <li>• Total waste is 7,369</li> <li>• Diversion rate is 30%</li> </ul> <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> <ul style="list-style-type: none"> <li>• Total weight of hazardous waste - 0</li> <li>• Total weight of non-hazardous waste - 7,369</li> </ul> <p>Disposal methods</p> <ul style="list-style-type: none"> <li>i) Reuse is unable to be fully tracked under the reuse category, as reuse versus recycled are tracked under the same data collection category. Reuse of bank equipment, furniture, and information technology assets are repurposed whenever feasible.</li> <li>ii) Comingled - 287 tons</li> <li>iii) Composting - 21 tons</li> <li>iv) Recovery - 0</li> <li>v) Incineration - 0</li> <li>vi) On-site storage - 0</li> <li>vii) Other - <ul style="list-style-type: none"> <li>Repurposed furnishings - 54 tons</li> <li>Electronic waste - 19 tons</li> <li>Shredded paper - 1,769 tons</li> <li>Lights/ballasts - 2 tons</li> <li>Batteries - 50 tons</li> <li>Bank equipment - 63 tons</li> </ul> </li> </ul> <p>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. In 2019, total waste was reduced by 30% year over year.</p> <ul style="list-style-type: none"> <li>i) Key directly measures resale of some assets and all donations to nonprofits</li> <li>ii) Contractors or landlords report shred, e-waste, metal, comingled, compost, and bank equipment</li> <li>iii) Default contracts with our contractors align to our waste management priorities</li> </ul>



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><a href="#">Page 23 of 2019 CR Report</a></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 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> <p><a href="#">Sections C1, C4, C6, C7, C9, C12; Question C2.2c of 2020 CDP Response</a></p> <p><a href="#">Page 3 of Supplier Code of Conduct</a></p> <p><a href="#">Page 23 of 2019 CR Report</a></p>										
103-3	Evaluate management approach	<p><a href="#">Page 23 of 2019 CR Report</a></p> <p><a href="#">Sections C4, C6, C7, C9 of 2020 CDP Response</a></p> <p>We are ahead of schedule to 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><td>2019</td></tr><tr><td>Metric tons CO2e</td><td>13,719</td><td>13,670</td><td>14,525</td><td>13,306</td></tr></table> <p><a href="#">Sections C5, C6, C7 of 2020 CDP response</a></p> <p><a href="#">Page 23 of 2019 CR Report</a></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	2019	Metric tons CO2e	13,719	13,670	14,525	13,306
	2016	2017	2018	2019								
Metric tons CO2e	13,719	13,670	14,525	13,306								

Item	Description	Response										
305-2	Energy indirect (Scope 2) GHG emissions	<table><tr><td></td><td>2016</td><td>2017</td><td>2018</td><td>2019</td></tr><tr><td>Metric tons CO2e</td><td>49,820</td><td>47,273</td><td>45,903</td><td>41,834</td></tr></table>		2016	2017	2018	2019	Metric tons CO2e	49,820	47,273	45,903	41,834
			2016	2017	2018	2019						
		Metric tons CO2e	49,820	47,273	45,903	41,834						
		<a href="#">Sections C5, C6, C7 of 2020 CDP Response</a>										
<a href="#">Page 23 of 2019 CR Report</a>												
		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><td>2019</td></tr><tr><td>Metric tons CO2e</td><td>65,508</td><td>67,803</td><td>69,572</td><td>75,108</td></tr></table>		2016	2017	2018	2019	Metric tons CO2e	65,508	67,803	69,572	75,108
			2016	2017	2018	2019						
		Metric tons CO2e	65,508	67,803	69,572	75,108						
		Increase due to more comprehensive data collection in our supply chain.										
<a href="#">Sections C5, C6, C7 of 2020 CDP Response</a>												
		<a href="#">Page 23 of 2019 CR Report</a>										
		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	0.0000071667 Combined gross global Scope 1 and Scope 2 emissions per unit of currency										
		Which is a 23% reduction YOY										
		0.00635 Combined gross global Scope 1 and Scope 2 emissions per square foot of real estate utilized										
		Which is a 6.69% reduction YOY										
		<a href="#">Question C6.10 of 2020 CDP Response</a>										
305-5	Reduction of GHG emissions	Scope 1 metric tons CO2e decreased 8.4%, decreases are largely attributed to behavior change, reduction of square footage under management. Mild weather was also a contributing factor.										
		Scope 2 metric tons CO2e reduced 8.9%, due primarily to capital improvement projects and reduction of square footage under management. Mild weather was also a contributing factor.										
		Combined Scope 1 and Scope 2 metric tons CO2e reduced 8.8% YoY.										
		<a href="#">Pages 23-24 of 2019 CR Report</a>										
		<a href="#">Sections C4, C5, C9; Questions C3.1, C3.1c, C6.5, C6.10, C7.9, C7.9a, C7.9b of 2019 CDP Response</a>										
		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, 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 and vendor relationships and investments.</p> <p><a href="#">Pages 3, 16-17, 23-24 of 2019 CR Report</a></p> <p><a href="#">Sections C4, C8, C12; Question C3.1c of 2019 CDP Response</a></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><a href="#">Pages 23-24 of 2019 CR Report</a></p> <p><a href="#">Sections C1, C2, C3, C4, C8, C12 of the 2019 CDP Response</a></p>																				
103-3	Evaluate management approach	<p><a href="#">Pages 23-24 of the 2019 CR Report</a></p> <p><a href="#">Sections C4, C8, C9, C12 of 2019 CDP Response</a></p>																				
302-1	Energy consumption within the organization	<table><thead><tr><th></th><th>2016</th><th>2017</th><th>2018</th><th>2019</th></tr></thead><tbody><tr><td>Direct Energy (GJ)</td><td>259,023</td><td>257,797</td><td>273,262</td><td>251,555</td></tr><tr><td>Indirect Energy (GJ)</td><td>502,385</td><td>472,407</td><td>461,428</td><td>421,008</td></tr><tr><td>Total (GJ)</td><td>761,408</td><td>730,204</td><td>734,690</td><td>672,563</td></tr></tbody></table> <p><a href="#">Pages 23-24 of 2019 CR Report</a></p> <p><a href="#">Section C8, Question C9.1 of 2020 CDP Response</a></p> <p>Inclusive of most, but not all of our square footage based on utility bills. Excluded square footage is not material.</p>		2016	2017	2018	2019	Direct Energy (GJ)	259,023	257,797	273,262	251,555	Indirect Energy (GJ)	502,385	472,407	461,428	421,008	Total (GJ)	761,408	730,204	734,690	672,563
	2016	2017	2018	2019																		
Direct Energy (GJ)	259,023	257,797	273,262	251,555																		
Indirect Energy (GJ)	502,385	472,407	461,428	421,008																		
Total (GJ)	761,408	730,204	734,690	672,563																		
302-2	Energy consumption outside of the organization	<p><a href="#">Section C4 and Question C6.5 of 2020 CDP Response</a></p>																				
302-3	Energy intensity	<p>.00196 FTE employees per square foot.</p> <p>Representing a decrease of 4.3%. This reflects the success of our optimization efforts as redundant buildings are vacated and condensed as part of the First Niagara Financial Group acquisition.</p> <p><a href="#">Question C9.1 of 2020 CDP Response</a></p>																				

Item	Description	Response
302-4	Reduction of energy consumption	<ul style="list-style-type: none"> <li>• Direct Energy use decreased 7.9% YOY</li> <li>• Indirect Energy use decreased 8.8% YOY</li> <li>• Combined Direct and Indirect use increased 8.5%</li> </ul> <a href="#">Pages 23-24 of 2019 CR Report</a> All of our direct and indirect energy reductions were due to facilities closures, behavior change, and infrastructure improvements focused on energy efficiency. <a href="#">Sections C4, C5; Questions C3.1-C3.1e of 2019 CDP Response</a>
302-5	Energy reductions in products and services	<a href="#">Page 16 of 2019 CR Report</a> <a href="#">Sections C2, C3, C12 of 2020 CDP Response</a>

### Supplier Environmental Assessment

103-1	Explanation of the material topic and its boundary	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. <a href="#">Page 3 of KeyBank Supplier Code of Conduct</a> Our Corporate Real Estate team has engaged suppliers on reporting expectations, disposal, and other sustainability measures supporting our goals since 2009. <a href="#">Section C12 of 2019 CDP Response</a>
103-2	Explain management approach components	<a href="#">Pages 7, 9, 28 of 2019 CR Report</a> <a href="#">Section C12 of 2020 CDP Response</a>
103-3	Evaluate management approach	<a href="#">Pages 7, 9, 28 of 2019 CR Report</a> <a href="#">Section C12 of 2020 CDP Response</a>
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.

Item	Description	Response
<b>Topic: Social</b>		
<b>Customer Privacy</b>		
103-1	Explanation of the material topic and its boundary	<p><a href="#">Page 30 of 2019 CR Report</a></p> <p><a href="#">Page 24 of 2019 10-K</a></p> <p><a href="#">Pages 8-11 of 2015 CR Report</a></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 10 material topics identified</p> <p>This includes all of Key's clients.</p>
103-2	Explain management approach components	<p>Data privacy, including cybersecurity, 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><a href="#">Pages 19, 25 - 28, 79 of 2019 10-K</a></p> <p><a href="#">Pages 15, 17 of 2020 Proxy</a></p>
103-3	Evaluate management approach	<a href="#">Pages 15, 17 of 2020 Proxy</a>
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>

Item	Description	Response
<b>Diversity and Equal Opportunity</b>		
103-1	Explanation of the material topic and its boundary	<p><a href="#">Pages 4-5, 9, 25-29 of 2019 CR Report</a></p> <p><a href="https://www.key.com/about/diversity/diversity-and-inclusion.jsp">https://www.key.com/about/diversity/diversity-and-inclusion.jsp</a></p> <p><a href="https://www.key.com/about/corporate-responsibility/kbings.jsp">https://www.key.com/about/corporate-responsibility/kbings.jsp</a></p> <p><a href="https://www.key.com/about/careers/working-with-us/military-veterans.jsp">https://www.key.com/about/careers/working-with-us/military-veterans.jsp</a></p> <p>Key embraces creating a diverse, equitable 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 &amp; Inclusion Council develops our strategy and programming to build an inclusive workplace supporting a diverse workforce. Our CEO leads the Council and works closely with council members comprised of cross-functional leaders across the enterprise.</p>
103-2	Explain management approach components	<p><a href="#">Pages 4-5, 9, 25-29 of 2019 CR Report</a></p> <p><a href="#">Pages 1-2, 4, 9-12, 14, 18, 20 of 2018 Diversity and Inclusion Annual Report</a></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 &amp; Inclusion. We are proud to have been named for the tenth 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><a href="#">Pages 4-5, 9, 25-29, 31 of 2019 CR Report</a></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><a href="#">Pages 25-26 of 2019 CR Report</a></p> <p><a href="#">Pages 3-9 of 2020 Proxy</a></p>

Item	Description	Response
<b>Employment</b>		
103-1	Explanation of the material topic and its boundary	<a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a> This is inclusive of all Key employees.
103-2	Explain management approach components	<a href="https://www.key.com/about/careers.jsp">https://www.key.com/about/careers.jsp</a> <a href="https://www.key.com/about/careers/working-with-us/work-life-balance.jsp">https://www.key.com/about/careers/working-with-us/work-life-balance.jsp</a> <a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a> <a href="#">Pages 4-5, 9, 25-29, 31 of 2019 CR Report</a>
401-1		a. What percentage of employees hired during the fiscal year were <b>women</b> ? 52% (full-time only for combined external and internal hires) b. What percentage of employees that left the company during the fiscal year were <b>women</b> ? 54% (full-time only).
401-3		d. Of <b>women</b> who returned from parental leave during fiscal year 2017, what percentage remained employed by the company 12 months after their return? 71%.
<b>Local Communities</b>		
103-1	Explanation of the material topic and its boundary	Inclusive of our operational footprint <a href="#">Page 3 of 2019 CR Report</a>
103-2	Explain management approach components	<a href="#">Pages 4-7, 9-10, 12-14, 16-21 of 2019 CR Report</a>
103-3	Evaluate management approach	<a href="#">Pages 6, 10, 12-14, 16-21, 29, 31 of 2019 CR Report</a>

Item	Description	Response
413-1	Operations with local community engagement, impact assessments, and development programs	<p>In 2019, KeyBank hosted a series of local community meetings, encouraging robust and candid dialogue about community needs. More than 40 community leaders attended our pilot in Western New York, where the collective group aligned on the community's greatest needs and prioritized a set of actions to address those needs. This collaborative approach leverages the strengths of each organization to drive meaningful impact in our communities.</p> <p>KeyBank's National Advisory Council consists of 14 national leaders, along with members of KeyBank's Executive Council and Corporate Responsibility team, and is focused on the success and well-being of low- to moderate-income communities. The Council met twice in 2019, focusing on issues such as strategic philanthropic investments, effective mortgage lending tools for low- to moderate-income borrowers and communities, and innovative strategies to deploy small business capital.</p> <p><a href="#">Page 7 of 2019 CR Report</a></p>

### Marketing and Labeling

417-3	Incidents of noncompliance concerning marketing communications	<p>Zero.</p> <p>To learn more information about any claims, please see our <a href="#">Public File</a>.</p>
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### Public Policy

103-1	Explanation of the material topic and its boundary	<p><a href="#">Page 18 of 2020 Proxy Statement</a></p> <p><a href="#">Statement of Political Activity</a></p>
103-2	Explain management approach components	<p><a href="#">Page 18 of 2020 Proxy Statement</a></p> <p><a href="#">Statement of Political Activity</a></p>
103-3	Evaluate management approach	<p><a href="#">Page 18 of 2020 Proxy Statement</a></p> <p><a href="#">Statement of Political Activity</a></p>
415-1	Political contributions	<p><a href="#">Page 18 of 2020 Proxy Statement</a></p> <p><a href="#">Statement of Political Activity</a></p>

### Social Supplier Assessment

103-1	Explanation of the material topic and its boundary	<p>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.</p> <p><a href="https://www.key.com/about/company-information/supplier-diversity.jsp">https://www.key.com/about/company-information/supplier-diversity.jsp</a></p> <p><a href="https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf">https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf</a></p>
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Item	Description	Response
103-2	Explain management approach components	<a href="https://www.key.com/about/company-information/suppliers/key-supplier-commitment.jsp">https://www.key.com/about/company-information/suppliers/key-supplier-commitment.jsp</a> <a href="https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp">https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp</a> <a href="#">Page 28 of 2019 CR Report</a> <a href="https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf">https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf</a> <a href="https://www.key.com/about/security/privacy-security.jsp">https://www.key.com/about/security/privacy-security.jsp</a>
103-3	Evaluate management approach	<a href="#">Page 28 of 2019 CR Report</a> <a href="https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf">https://www.key.com/kco/images/Supplier_Code_of_Conduct_1219.pdf</a>
414-1	New suppliers that were screened using social criteria	<p>All new suppliers are screened using social criteria as part of the RFP/RFQ process.</p> <p>Suppliers determined to be strategic partners or of sufficient size are asked to report on supplier diversity in their supply chain.</p> <p>When applicable, they must show security controls and relevant certifications are in place to protect customer privacy and data.</p> <a href="#">Page 28 of 2019 CR Report</a> <a href="https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp">https://www.key.com/about/company-information/suppliers/key-supplier-registration.jsp</a> <a href="https://www.key.com/about/security/privacy-security.jsp">https://www.key.com/about/security/privacy-security.jsp</a>
414-2	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	<p>Zero.</p> <a href="#">Supplier Code of Conduct</a>

### 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> <a href="https://www.key.com/about/careers/career-development.jsp">https://www.key.com/about/careers/career-development.jsp</a> <a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a> <a href="#">Pages 9, 27-29 of 2019 CR Report</a>
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Item	Description	Response
103-2	Explain management approach components	<a href="https://www.key.com/about/careers/career-development.jsp">https://www.key.com/about/careers/career-development.jsp</a> <a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a> <a href="#">Pages 9, 27-29 of 2019 CR Report</a> <a href="#">Question 2.3a of 2020 CDP Response</a>
103-3	Evaluate management approach	<a href="https://www.key.com/about/careers/career-development.jsp">https://www.key.com/about/careers/career-development.jsp</a> <a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a> <a href="#">Pages 27-29 of 2019 CR Report</a>
404-2	Programs for upgrading employee skills and transition assistance programs	<p>Key provides tools, resources and training for employees to be successful today in their current roles and in the future; as internal and external trends shape the skills and capabilities needed. Examples of tools and resources to support employee learning and development include an enterprise mentoring program, access to a career development tool and internal/external training resources on business, technical and people skills.</p> <p><a href="https://www.key.com/about/careers/development/career-mobility.jsp">https://www.key.com/about/careers/development/career-mobility.jsp</a></p> <p>If an employee's position is eliminated due to staff reduction activity, Key is committed to supporting the employee by providing benefits to assist the employee in transitioning to other employment. Key provides salary continuation based on job level and length of service, benefits continuation and career transition services through a third-party provider including resume assistance, interview coaching and job search resources. When an employee elects to retire from Key, the employee is eligible based on age and length of service for retirement benefits including retirement plan distributions, retiree medical coverage, and other certain benefits. Pre-retirement planning resources and employee wellness resources are also provided to assist employees with managing through the transition.</p> <p><a href="https://www.key.com/about/careers/career-development.jsp">https://www.key.com/about/careers/career-development.jsp</a>  <a href="https://www.key.com/about/careers/working-with-us/benefits.jsp">https://www.key.com/about/careers/working-with-us/benefits.jsp</a>  <a href="#">Pages 9, 27-29 of 2019 CR Report</a></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%

KeyCorp  
127 Public Square  
Cleveland, OH 44114

Phone:  
216-689-3000

TDD/TTY:  
1-800-539-8336

Email:  
[general@keybank.com](mailto:general@keybank.com)

Twitter:  
[@KeyBank](https://twitter.com/KeyBank)  
[@KeyBank\\_Help](https://twitter.com/KeyBank_Help)  
[@Key4Women](https://twitter.com/Key4Women)

Facebook:  
[facebook.com/KeyBank](https://facebook.com/KeyBank)

