

# helping our clients and communities thrive

2011 KeyCorp Corporate Social Responsibility Report  
GRI Index



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## Standard disclosures part 1: Profile disclosures

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Strategy and analysis</b>			
1.1	Statement from the most senior decision-maker of the organization.	●	Page 4
<b>Organizational profile</b>			
2.1	Name of the organization.	●	KeyCorp
2.2	Primary brands, products, and/or services.	●	Page 11
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	●	Page 11
2.4	Location of organization's headquarters.	●	Page 11
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	●	Page 11
2.6	Nature of ownership and legal form.	●	KeyCorp was organized in 1958 under the laws of the state of Ohio. It is publicly traded company, headquartered in Cleveland, Ohio.
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	●	Page 8, 11
2.8	Scale of the reporting organization.	●	Page 6, 7, 8, 29
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	●	There were no material changes to size, structure or ownership during the reporting period.
2.10	Awards received in the reporting period.	●	Page 17, 25, 37

Profile Disclosure	Description	Reported	Location in report
<b>Report parameters</b>			
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	●	Page 59
3.2	Date of most recent previous report (if any).	●	Page 59
3.3	Reporting cycle (annual, biennial, etc.)	●	Page 59
3.4	Contact point for questions regarding the report or its contents.	●	Page 59
3.5	Process for defining report content.	●	Page 59
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	●	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	●	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	●	This report covers all KeyCorp owned entities over which the organization exercises control and that generate significant sustainability impacts.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	●	Page 59

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## Standard disclosures part 1:

### Profile disclosures

Profile Disclosure	Description	Reported	Location in report
<b>Report parameters (continued)</b>			
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	●	Page 59
3.12	Table identifying the location of the Standard Disclosures in the report.	●	Pages 50-57
<b>Governance, commitments, and engagement</b>			
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	●	Page 7
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	●	Beth E. Mooney currently serves as KeyCorp's Chairman of the Board and Chief Executive Officer.
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	●	Page 7
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	●	Page 59
4.14	List of stakeholder groups engaged by the organization.	●	Page 12, 23, 59
4.15	Basis for identification and selection of stakeholders with whom to engage.	●	Page 59

## Standard disclosures part 3:

### Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Economic</b>			
<b>Economic performance</b>			
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	●	
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	●	Page 13, 22, 23
EC3	Coverage of the organization's defined benefit plan obligations.	●	
EC4	Significant financial assistance received from government.	●	
<b>Market presence</b>			
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	●	
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	●	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	●	

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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Economic (continued)</b>			
<b>Indirect economic impacts</b>			
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	●	
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	●	
<b>Environmental</b>			
<b>Materials</b>			
EN1	Materials used by weight or volume.	●	
EN2	Percentage of materials used that are recycled input materials.	●	
<b>Energy</b>			
EN3	Direct energy consumption by primary energy source.	●	Page 40
EN4	Indirect energy consumption by primary source.	●	Page 40
EN5	Energy saved due to conservation and efficiency improvements.	●	
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	●	Page 37, 39
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	●	Page 37, 39

Profile Disclosure	Description	Reported	Location in report
<b>Water</b>			
EN8	Total water withdrawal by source.	●	Page 40
EN9	Water sources significantly affected by withdrawal of water.	●	Page 40
EN10	Percentage and total volume of water recycled and reused.	●	
<b>Biodiversity</b>			
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	●	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	●	
EN13	Habitats protected or restored.	●	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	●	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	●	

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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Environmental (continued)</b>			
<b>Emissions, effluents and waste</b>			
EN16	Total direct and indirect greenhouse gas emissions by weight.	●	Page 39, 40
EN17	Other relevant indirect greenhouse gas emissions by weight.	●	Page 40
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	●	Page 37, 39
EN19	Emissions of ozone-depleting substances by weight.	●	
EN20	NOx, SOx, and other significant air emissions by type and weight.	●	
EN21	Total water discharge by quality and destination.	●	
EN22	Total weight of waste by type and disposal method.	●	
EN23	Total number and volume of significant spills.	●	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	●	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	●	

Profile Disclosure	Description	Reported	Location in report
<b>Products and services</b>			
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	●	Page 37, 39, 41, 42
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	●	
<b>Compliance</b>			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	●	
<b>Transport</b>			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	●	
<b>Overall</b>			
EN30	Total environmental protection expenditures and investments by type.	●	Page 18, 37, 39, 42

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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Social: Labor Practices and Decent Work</b>			
<b>Employment</b>			
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	●	
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	●	
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	●	
LA15	Return to work and retention rates after parental leave, by gender.	●	
<b>Labor/management relations</b>			
LA4	Percentage of employees covered by collective bargaining agreements.	●	
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	●	

Profile Disclosure	Description	Reported	Location in report
<b>Occupational health and safety</b>			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	●	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	●	
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	●	
LA9	Health and safety topics covered in formal agreements with trade unions.	●	
<b>Training and education</b>			
LA10	Average hours of training per year per employee by gender, and by employee category.	●	
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	●	
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	●	

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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Social: Labor Practices and Decent Work (continued)</b>			
<b>Diversity and equal opportunity</b>			
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	●	
<b>Equal remuneration for women and men</b>			
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	●	
<b>Social: Human Rights</b>			
<b>Investment and procurement practices</b>			
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	●	
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	●	
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	●	

Profile Disclosure	Description	Reported	Location in report
<b>Non-discrimination</b>			
HR4	Total number of incidents of discrimination and corrective actions taken.	●	
<b>Freedom of association and collective bargaining</b>			
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	●	
<b>Child labor</b>			
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	●	
<b>Prevention of forced and compulsory labor</b>			
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	●	
<b>Security practices</b>			
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	●	



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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Social: Human Rights (continued)</b>			
<b>Indigenous rights</b>			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	●	
<b>Assessment</b>			
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	●	
<b>Remediation</b>			
HR11	"Number of grievances related to human rights filed, addressed and resolved through formal grievance	●	
<b>Social: Society</b>			
<b>Local communities</b>			
S01 (FSSS)	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	●	Page 16, 17
S09	Operations with significant potential or actual negative impacts on local communities.	●	
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	●	

Profile Disclosure	Description	Reported	Location in report
<b>Corruption</b>			
S02	Percentage and total number of business units analyzed for risks related to corruption.	●	Page 24
S03	Percentage of employees trained in organization's anti-corruption policies and procedures.	●	Page 24
S04	Actions taken in response to incidents of corruption.	●	
<b>Public policy</b>			
S05	Public policy positions and participation in public policy development and lobbying.	●	Page 23
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	●	
<b>Anti-competitive behavior</b>			
S07	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	●	
<b>Compliance</b>			
S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	●	

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## Standard disclosures part 3: Performance indicators

● Fully ● Partially ● Not

Profile Disclosure	Description	Reported	Location in report
<b>Social: Product Responsibility</b>			
<b>Customer health and safety</b>			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	●	
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	●	
<b>Product and service labelling</b>			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	●	
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	●	
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	●	
FS16	Initiatives to enhance financial literacy by type of beneficiary.	●	Page 16, 17

Profile Disclosure	Description	Reported	Location in report
<b>Marketing communications</b>			
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	●	
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	●	
<b>Customer privacy</b>			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	●	
<b>Compliance</b>			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	●	

# about this report

# about this report

This is our first Corporate Social Responsibility Report against the Global Reporting Initiative (GRI) framework, which we have applied at Level C. GRI is a valuable international reporting standard, and we expect to expand our reporting against its guidelines in the coming years.

Content for this report was defined by Key's Environment and Social Governance Council, led by Chris Gorman, President of Key Corporate Bank. We identified the environmental and social risks, issues, and opportunities that are important or material to our business by engaging our closest stakeholders, including our shareholders, employees, clients and corporate peers, Board of Directors, and executive leadership. Their input informed the goals and priorities detailed here.

We believe that this report accurately represents our response to the expectations, issues, and interests these stakeholders identified. Their views and concerns are the core of Key's sustainability strategy.

We expect that the stakeholders cited above, as well as many others including governmental agencies, regulators, suppliers, and nonprofits, will use this report and play important roles in helping us set and achieve our future goals.

This report covers the period from January 1, 2011 to December 31, 2011. Our last CSR report was issued in September of 2011; going forward, we anticipate reporting annually in the second quarter of each year, reflecting results from the previous calendar/fiscal year.

Follow our progress on Twitter at [twitter.com/KeyBank\\_Thrive](https://twitter.com/KeyBank_Thrive), and on our Facebook page at [facebook.com/KeyBankCommunity](https://facebook.com/KeyBankCommunity)

Shareholders may submit proposals to be considered for inclusion in KeyCorp's annual proxy statement in accordance with the provisions of Rule 14a-8 of the Securities Exchange Act of 1934, as amended.

KeyCorp provides a means for shareholders to submit proposals for consideration outside of Rule 14a-8 as long as the Secretary of KeyCorp receives those proposals no fewer than 60 and no more than 90 days before the annual meeting. Shareholders are required, among other things, to submit the text of the proposal and a brief written statement of the reasons why the shareholder favors it.

Anyone who wishes to share comments and views about KeyCorp with the Board may mail a statement to KeyCorp at its corporate headquarters in Cleveland, Ohio. Correspondence should be sent to the Lead Director, KeyCorp Board of Directors, care of the Secretary of KeyCorp, and marked "Confidential."

## **KeyCorp**

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