

THE CITIGROUP ANTI-BRIBERY AND CORRUPTION PROGRAM

Citigroup Inc. (“Citi”) is committed to conducting business in accordance with the highest ethical standards and in compliance with applicable anti-bribery and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the applicable local anti-bribery and corruption laws of the countries in which Citi operates.

Citi’s mission is to responsibly provide financial services to enable growth and economic progress. To fulfill this mission, Citi asks its personnel that their decisions pass three tests: that they are in their client’s interests, create economic value, and are always systemically responsible. Citi’s Anti-Bribery and Corruption Program embodies these principles by fostering conduct that is transparent, prudent, trustworthy, and responsible.

As part of its Anti-Bribery and Corruption Program, Citi has implemented written policies, standards, procedures, and internal controls that are aligned with Citi’s Compliance Risk Management Framework and reasonably designed to comply with applicable anti-bribery and corruption laws.

The Anti-Bribery and Corruption Program includes: risk management processes (oversight, governance, and escalation); a risk assessment process; communication and training for Citi staff at all levels; review and pre-approval processes (e.g., for business gifts, entertainment, travel and lodging, as well as hiring, charitable and political contributions, and government directed (including relief) payments); due diligence on third party relationships, business deals, proprietary mergers, acquisitions and investments, and new activities, including products and services offered by Citi; controls oversight; channels for escalation and reporting of concerns (which are treated confidentially, consistent with the need to investigate the matter); financial controls and record keeping; independent monitoring and testing processes; and independent audit.

Bribery and corruption have no place at Citi. Employees are prohibited from offering, promising, giving, or agreeing to give, or accepting, requesting, or agreeing to accept bribes and other improper advantages, and such prohibition applies not only to the employees’ engagement with government and public officials and employees or officials of organizations with government ownership or control, but also includes clients, third parties, suppliers, and any person with whom Citi does or anticipates doing business.

Employees are prohibited from providing anything of value to obtain or retain business or any advantage, financial or otherwise, in violation of applicable laws or regulations, or in breach of the Citi Anti-Bribery & Corruption Policy. “Anything of value” extends beyond cash or cash equivalents to include gifts, entertainment, travel and/or lodging, charitable and political contributions, and employment or internships for individuals, including clients, government officials (including U.S. Public Officials), or their related persons. In addition, Citi expressly prohibits the provision of facilitation payments.

Citi has zero tolerance for bribery and corruption. Employees who engage in, or facilitate bribery, or who fail to comply with all applicable anti-bribery and corruption laws, regulations, or Citi’s policies or Code of Conduct, may be subject to disciplinary action, which, depending on the severity, could be up to and including termination.

The Anti-Bribery and Corruption Program is reasonably designed to identify, evaluate, oversee, and mitigate the potential bribery risk particularly associated with agents, suppliers, and other third parties, including those acting on behalf of Citi. The Anti-Bribery and Corruption Program establishes the requirements and controls that are applicable to such third parties, including a due diligence process, and the incorporation of anti-bribery and corruption contract provisions into the relevant agreements, as applicable.

Citi provides several escalation channels through which Citi personnel may communicate any concerns (including anonymously to the extent permitted by applicable laws and regulations) regarding any bribery- or corruption-related misconduct, including potential violations of applicable law or breaches of the Citi Anti-Bribery & Corruption Policy, the related standards and procedures, or the Code of Conduct. Citi prohibits any form of retaliatory action against anyone who raises such concerns or participates in subsequent investigations of such concerns.

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