

THE CITIGROUP GLOBAL INDEPENDENT COMPLIANCE RISK MANAGEMENT (ICRM) ANTI-BRIBERY AND CORRUPTION PROGRAM

Citigroup Inc. (“Citi”) is committed to conducting business in accordance with the highest ethical standards and in full compliance with all 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 and value proposition is to enable growth and economic progress. To fulfill this mission, Citi personnel ensure their decisions are in our 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, procedures, and internal controls that are aligned with Citi’s Compliance Risk Management Framework and reasonably designed to comply with 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; review and pre-approval processes; due diligence on third party relationships, business transactions/deals, and new products; controls oversight and confidential reporting; financial controls and record keeping; and independent testing processes.

Bribery and corruption have no place at Citi. Employees are prohibited from offering (or agreeing to offer), soliciting, or accepting (or agreeing to accept) bribes and other improper financial advantages:

- Employees may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. “Anything of value” extends beyond cash or cash equivalents to include improper gifts, entertainment, travel and/or lodging, charitable and political contributions, and employment or internships for clients, government officials (including U.S. Public Officials), or their related persons.
- The prohibition against the provision of anything of value applies to not only government officials and employees or officials of organizations with government ownership or control, but also includes clients, suppliers, and any person with whom Citi does or anticipates doing business. Citi expressly prohibits the provision of facilitation payments.

Citi expects all of its agents and suppliers to act at all times in compliance with applicable anti-bribery and corruption laws and regulations.

Employees who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery and corruption laws, regulations, and Citi’s policies and Code of Conduct, may be subject to disciplinary action, up to and including termination. Citi reserves the right to terminate immediately any business relationship that violates our high ethical standards and our mission and value proposition.

UPDATED AS OF JULY 2022