



Political Activities Statement

Citi believes that responsible corporate citizenship includes engagement in the legislative process. Because of the potential impact of public policy on our business, employees, and customers, we engage in the political process at the local, state and federal levels.

Political Contributions

Citi's political action committees (PACs) are funded through voluntary contributions from our eligible employees. PAC boards composed of senior business managers approve where and to whom those contributions are made.

Contributions by Citi's PACs—or when permitted, from corporate funds—support candidates or political party committees whose views on specific issues are consistent with Citi's priorities. Consideration is given to candidates who represent the communities that Citi serves, are in leadership roles, or serve on committees relevant to our industry.

Citi does not use corporate funds for independent political expenditures in support of, or opposition to, any candidate for office. That prohibition also applies to payments made to trade associations. Each payment to trade associations is individually reviewed, and subject to attestation, to ensure compliance with this prohibition.

Citi publicly discloses all our political contributions—from corporate funds and from Citi's PACs. The list is updated and posted on our website annually in the first quarter.

Contributions, as required by law, are reported in filings to the Federal Elections Commission and to relevant state agencies. Citi complies with all applicable laws, including Municipal Securities Rulemaking Board Rule G-37, Securities and Exchange Commission Rule 206(4)-5, Commodity Futures Trading Commission Rule 23.451 and applicable state and local pay-to-play restrictions. In support of efforts to comply with the laws, Citi also maintains a firewall between its Global Government Affairs (GGA) office and certain covered employees that prohibits the discussion of, or recommendations regarding, giving to any candidate running for state or local office, or for federal office as covered by the aforementioned rules. The firewall also prohibits such interaction between the Citi PACs and those within GGA who manage political giving activities.

Advocacy and Lobbying

Citi's Global Government Affairs staff and contract lobbyists actively lobby on public policy issues that impact the company and our ability to do business globally. We regularly express our views to public officials and provide them with factual briefings to inform their decisions. State, federal, and international laws regulate lobbying activity and reporting requirements.



As outlined in the Citi Code of Conduct and Citi Expense Management Policy, only Citi's Global Government Affairs team and our Municipal Securities Division (because of Municipal Securities Rulemaking Board Rules) are authorized to retain legislative lobbyists on behalf of Citi. Global Government Affairs lobbying professionals are required to attend training on applicable laws and internal compliance policies, and are expected to demonstrate the highest standards of professional integrity.

Lobbying disclosures are routinely made where required by law. Citi files lobbying disclosure reports with the U.S. Federal government and state authorities. A list of the lobbying disclosure sites is available on our website.

In the future, if Citi engages in grassroots lobbying, by potentially engaging a broader range of Citi staff in advocacy efforts in support of the company's interests, we will voluntarily disclose our activity on the website.

Citi from time to time participates in state and local ballot initiatives that affect our business. Should Citi engage in a state ballot initiative in the future, we will voluntarily disclose our contributions on our website.

Trade Associations

Citi is a member of industry trade associations representing both the financial services industry and the broader business community. These organizations provide venues for important discussion regarding public policy issues and opportunities to advocate for common business interests. Our participation in these groups does not imply that Citi necessarily agrees with every position these associations take. [View the list](#) of principal U.S. and international trade and business associations in which Citi has a membership.

When Citi participates in a tax-exempt organization that writes and endorses model legislation, we will disclose that information on our website.

Compliance and Board Oversight

Several Citi policies govern compliance with this statement and applicable laws, including policies addressing interactions with public officials, gifts and entertainment of public officials, corporate political contributions, lobbying disclosures, and payments made to trade associations.

The head of Global Government Affairs reports to the Executive Vice President for Global Public Affairs who in turn reports to the CEO. The Nomination, Governance and Public Affairs Committee of the Board of Directors provides oversight of Citi's government relations activities and reviews the company's lobbying activities and strategy, political contribution activities, and trade association memberships.