Citigroup Global Markets Limited

Pillar 3 Disclosures

March 2025

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Introduction

Citigroup Global Markets Limited ("CGML" or "the Company") is a wholly owned, indirect subsidiary of Citigroup Inc. ("Citi"), limited by shares. It is Citi's international broker dealer, and one of Citi's four major global booking hubs serving clients from its headquarters in London or its international subsidiaries and branches. CGML acts as a market maker in equity, fixed income and commodity products across cash, over-the-counter ("OTC") derivatives and exchange traded markets, as well as a provider of investment banking capital markets and advisory services. CGML operates globally, generating the majority of its business from the United Kingdom ("UK"), with the remainder coming from North Asia and North America clusters.

CGML is authorised by the Prudential Regulation Authority ("PRA") and regulated by the PRA and Financial Conduct Authority ("FCA"). CGML is also a Commodity Futures Trading Commission registered swap dealer, and United States Securities Exchange Commission registered security-based swap dealer, and is considered a Risk-Taking Operating Material Legal Entity ("MLE") in Citi's Global Resolution Plan.

As at 31 March 2025, CGML had four branch offices and three subsidiaries, as listed below. As at the time of publication of this exposure, the Italy branch of CGML is currently under liquidation.

Subsidiaries
Citigroup Global Markets Europe AG (Germany)
Citigroup Global Markets Funding Luxembourg SCA
Citigroup Global Markets Funding Luxembourg GP S.a.R.L.

CGML's businesses predominantly support the Markets and Investment Banking segments of Citi's operations and is almost entirely wholesale in nature, with a client base that encompasses corporates, financial institutions, institutional and other investors, as well as governments and public sector entities. CGML's principal business activities are outlined on page 1 and 2 of CGML's 2024 Financial Statements.

Regulatory framework for Disclosure

The Basel Framework mandates a framework of capital adequacy regulation for banks and investment firms incorporating three distinct pillars:

- Pillar 1 prescribes the minimum capital requirements for such firms;
- Pillar 2 addresses the associated supervisory review process; and,
- Pillar 3 specifies further public disclosure requirements in respect of their capital and risk profile.

CGML follows the UK's implementation of the Capital Requirements Regulation ("CRR") and Capital Requirement Derivative ("CRD V"), and associated PRA published rules and standards.

These disclosures are made in accordance with Section 4 of the PRA Rulebook on Disclosure (CRR). In addition, CGML has implemented the disclosure templates and instructions as set out in the final rules published by the PRA in Policy Statement 22/21.

Disclosures are prepared for CGML on a consolidated Group basis. As at 31 March 2025, Citigroup Global Markets Europe AG ("CGME") was the only material subsidiary of CGML. CGME is supervised by the European Central Bank.

Means of Disclosure

CGML publishes its Pillar 3 disclosures quarterly, available at: https://www.citigroup. com/citi/investors/reg.htm.

Our Pillar 3 disclosures complement CGML's Financial Statements, also available at the same location, and the Citigroup Inc. Annual Report and 10-K, available at https://www.citigroup.com/global/investors/annual-reports-and-proxy-statements

Disclosures for CGML's material subsidiary, CGME, are also published at the above location alongside CGML's Pillar 3.

Quantitative Disclosure

Rows and columns determined not to be relevant or reportable may in places have been omitted from individual disclosure tables.

Please note there may remain instances where tables do not cast due to rounding.

Policy and Verification

The firm operates within a framework of internal controls and procedures for assessing the appropriateness of this disclosure. In accordance with the PRA rulebook, CGML's Pillar 3 disclosures are governed under an approved Pillar 3 Standard, which outlines the principles and standards to be applied for preparing CGML's Pillar 3 disclosures.

These disclosures are attested to by the UK Chief Finance Officer ("CFO"):

"I confirm that I have taken reasonable measures to ensure that these disclosures comply with the requirements under Section 4 of the PRA rulebook on Disclosure, and have been prepared in accordance with the internal processes, systems and controls as detailed in the UK Pillar 3 Standard."

Graham Westgarth
UK Chief Finance Officer

Leverage

The leverage ratio is a measure which allows for the assessment of an institutions' exposure to the risk of excessive leverage. It is a simple non-risk based measure to reinforce and compliment the risk based capital framework.

CGML is subject to the UK Leverage Framework and is defined as a Leverage Ratio Requirements ("LREQ") entity. As such, CGML is subject to a minimum leverage ratio of 3.25% and a minimum leverage requirement for Countercyclical leverage buffer.

Table 1: Leverage ratio common disclosure (UK LR2 – LRCom)

This table provides a breakdown of the components of CGML's leverage exposures.

		31 March 2025	31 December 2024
		$ million	$ million
Capital and total exposure measure			
23	**Tier 1 capital (leverage)**	**27,668**	27,252
24	Total exposure measure including claims on central banks	**410,181**	334,856
UK-24a	(-) Claims on central banks excluded	**(3,873)**	(4,198)
UK-24b	**Total exposure measure excluding claims on central banks**	**406,308**	330,658
Leverage ratio			
25	Leverage ratio excluding claims on central banks (%)	**6.8%**	8.2%
UK-25a	Fully loaded ECL accounting model leverage ratio excluding claims on central banks (%)	**6.8%**	8.2%
UK-25b	Leverage ratio excluding central bank reserves as if the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income had not been applied (%)	—	—
UK-25c	Leverage ratio including claims on central banks (%)	**6.7%**	8.1%
26	Regulatory minimum leverage ratio requirement (%)	**3.25%**	3.25%
Additional leverage ratio disclosure requirements – leverage ratio buffers			
27	Leverage ratio buffer (%)	**0.3%**	0.3%
UK-27a	Of which: G-SII or O-SII additional leverage ratio buffer (%)	—	—
UK-27b	Of which: countercyclical leverage ratio buffer (%)	**0.3%**	0.3%
Additional leverage ratio disclosure requirements – disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	—	—
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	—	—
UK-31	Average total exposure measure including claims on central banks	**382,672**	372,003
UK-32	Average total exposure measure excluding claims on central banks	**378,577**	367,731
UK-33	Average leverage ratio including claims on central banks	**7.1%**	7.3%
UK-34	Average leverage ratio excluding claims on central banks	**7.2%**	7.4%

CGML's leverage ratio decreased by 1.4% across the first quarter to 6.8%, primarily reflecting a $75.7 billion increase in total leverage exposure measure. This is driven by expected seasonality and client activity increasing SFT assets on the Balance Sheet, along with a further increase in trading assets.

Minimum Requirement for Own Funds and Eligible Liabilities

For resolution plans to be feasible and credible, UK firms are required to maintain sufficient resources that can absorb losses and provide for recapitalisation in resolution. To achieve this, the Bank of England, as the UK's resolution authority, requires all banks, building societies and certain investment firms to maintain a minimum requirement for own funds and eligible liabilities ("MREL").

As part of the MREL reform in the UK, article 92(b) was deleted from the UK CRR effective from 1 January 2024. CGML, as a UK subsidiary of a non-UK Global Systemically Important Bank ("GSIB"), remains subject to a Bank of England internal MREL requirement of two times the sum of Pillar 1 plus Pillar 2A, scaled at 75%. As at 31 March 2025, CGML had own funds and eligible liabilities in excess of its internal MREL requirement.

Table 2: Key Metrics – MREL requirements (KM2)

	$ million	31 March 2025	31 December 2024	30 September 2024	30 June 2024	31 March 2024
1	Total MREL available	37,968	37,552	37,686	38,751	38,790
2	Total RWA	151,071	146,156	154,534	152,533	159,405
3	MREL as a percentage of RWA (%)	25.1%	25.7%	24.4%	25.4%	24.3%
4	Leverage exposure measure	406,308	330,658	374,851	428,025	464,472
5	MREL as a percentage of leverage exposure measure (%)	9.3%	11.4%	10.1%	9.1%	8.3%

A reduction in the MREL metrics reflects increases across the total risk weighted assets and the leverage exposure measure at the end of the first quarter, primarily driven by increased client activity.

Abbreviations

Please refer to the below abbreviations used frequently throughout the document.

CFO	Chief Finance Officer
CGME	Citigroup Global Markets Europe AG
CGML	Citigroup Global Markets Limited
CITI	Citigroup Inc.
CRD	Capital Requirements Directive
CRR	Capital Requirements Regulation
ECL	Expected Credit Loss
FCA	Financial Conduct Authority
GSIB	Global Systemically Important Bank
G-SII	Global Systematically Important Institution
LREQ	UK Leverage Ratio - Capital Requirement & Buffers
MLE	Material Legal Entity
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
O-SII	Other Systematically Important Institution
OTC	Over The Counter
PRA	Prudential Regulation Authority
RWA	Risk Weighted Assets
SFT	Securities Financing Transaction

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