



Citigroup Global Markets Limited

Pillar 3 Disclosures

31 December 2024



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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 December 2024, 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 corresponding 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 December 2024, 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 2024 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

Where disclosures are not relevant or deemed immaterial to the activities of CGML, these have been omitted and detailed in Appendix 4.

In addition, 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 governed by the CGML Board of Directors and were approved on 1 May 2025, and attested to by the UK Chief Finance Officer (“CFO”) and the UK Chief Risk Officer (“CRO”):

“We confirm that we 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

Manjira Sen-Gosain
UK Chief Risk Officer

Regulatory Outlook

Basel 3.1

The Basel Committee on Banking Supervision has proposed new regulations, often referred to as Basel 3.1, covering a number of areas such as a new Standardised Approach to Credit Risk, a new Credit Valuation Adjustment ("CVA") framework, revisions to the approach to Securities Financing Transactions, Fundamental Review of the Trading Book, the Output Floor and a new Standardised Approach to Operational Risk.

In December 2023, the PRA published part one of their near-final policy statements in relation to the implementation of the Basel 3.1 standards covering the chapters for Market Risk, CVA, Operational Risk, Pillar 2 and currency redenomination.

In September 2024, the PRA published part 2 of their near-final policy statement covering the remaining chapters for Standardised Approach for Credit Risk, Credit Risk Mitigation, the Output Floor, Disclosure and Reporting. In October 2024, the PRA published a consultation paper setting out their proposals to restate relevant provisions in the CRR in the PRA Rulebook and other policy material such as Supervisory Statements or Statements of Policy.

His Majesty's Treasury ("HMT") will make the Statutory Instruments required to revoke CRR articles that will be replaced by the PRA's proposed rules and make any necessary amendments to ensure the coherence and continuity of the regime. After this, the PRA will publish final rule instruments, policy materials and technical standards in a single, final policy statement.

The PRA announced in January 2025 that the implementation date for all elements of the Basel 3.1 standards will be delayed until 1 January 2027.

Large Exposures

In October 2024, the PRA published proposals to implement the remaining elements of Basel's large exposures standards. The proposal includes amendments to trading book exposures limits, both for third-party exposures as well as for exposures to intragroup entities. It sets out modifications to the permissions' regime to allow for higher intragroup exposures and the calculation for additional capital. It also includes the implementation of the substitution approach to calculate the effect of the use of credit risk mitigation techniques.

Key Metrics

Table 1: Key metrics template (UK KM1)

		31 December 2024	30 June 2024	31 December 2023
	Available own funds (amounts)	\$ million	\$ million	\$ million
1	Common Equity Tier 1 ("CET1") capital	22,952	23,351	23,429
2	Tier 1 capital	27,252	27,651	27,729
3	Total capital	29,425	29,984	30,222
	Risk-weighted exposure amounts			
4	Total risk-weighted exposure amount ("RWA")	146,156	152,533	154,458
	Capital ratios (as a percentage of risk-weighted exposure amount)			
5	Common Equity Tier 1 ratio (%)	15.7%	15.3%	15.2%
6	Tier 1 ratio (%)	18.6%	18.1%	18.0%
7	Total capital ratio (%)	20.1%	19.7%	19.6%
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)			
UK 7a	Additional CET1 SREP requirements (%)	1.4%	1.4%	1.4%
UK 7b	Additional AT1 SREP requirements (%)	0.5%	0.5%	0.5%
UK 7c	Additional T2 SREP requirements (%)	0.6%	0.6%	0.6%
UK 7d	Total SREP own funds requirements (%)	10.5%	10.5%	10.5%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)			
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%
UK 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	—	—	—
9	Institution specific countercyclical capital buffer (%)	0.9%	0.9%	0.8%
UK 9a	Systemic risk buffer (%)	—	—	—
10	Global Systemically Important Institution buffer (%)	—	—	—
UK 10a	Other Systemically Important Institution buffer	—	—	—
11	Combined buffer requirement (%)	3.4%	3.4%	3.3%
UK 11a	Overall capital requirements (%)	13.8%	13.8%	13.8%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.7%	9.2%	9.1%
	Leverage ratio			
13	Total exposure measure excluding claims on central banks	330,658	428,025	437,240
14	Leverage ratio excluding claims on central banks (%)	8.2%	6.5%	6.3%
	Additional leverage ratio disclosure requirements			
14a	Fully loaded ECL accounting model leverage ratio excluding claims on central banks (%)	8.2%	6.5%	6.3%
14b	Leverage ratio including claims on central banks (%)	8.1%	6.4%	6.3%
14c	Average leverage ratio excluding claims on central banks (%)	7.4%	6.2%	6.1%
14d	Average leverage ratio including claims on central banks (%)	7.3%	6.1%	6.1%
14e	Countercyclical leverage ratio buffer (%)	0.3%	0.3%	0.3%
	Liquidity Coverage Ratio¹			
15	Total high-quality liquid assets ("HQLA") (Weighted value -average)	39,896	42,481	47,334
UK 16a	Cash outflows – Total weighted value	51,665	48,117	47,604
UK 16b	Cash inflows – Total weighted value	41,000	38,472	35,378
16	Total net cash outflows (adjusted value)	13,675	12,352	13,160
17	Liquidity coverage ratio ("LCR") (%)	295.0%	347.2%	364.0%
	Net Stable Funding Ratio²			
18	Total available stable funding ("ASF")	81,930	75,460	78,398
19	Total required stable funding ("RSF")	69,538	63,004	61,131
20	Net Stable Funding Ratio ("NSFR") (%)	118.0%	120.0%	128.4%

¹LCR metric is presented on an average of preceding 12 months.

²NSFR metric is presented on an average of preceding 4 quarters.

As at 31 December 2024, CGML's CET1 ratio has increased to 15.7%. Whilst CET1 capital reduced over the period, this was more than offset by a decrease in risk weighted assets ("RWA") of \$6.4 billion. The primary decrease in RWA reflects a reduction across Counterparty Credit Risk ("CCR").

CGML's leverage ratio increased 1.9% over the year to 8.2% as at 31 December 2024, primarily reflecting a \$106.6 billion decrease in total exposure measure. This is driven by the a reduction in Securities Finance Transactions ("SFT") assets on the balance sheet and the impact of enhanced netting for credit derivatives.

In addition, CGML's liquidity coverage ratio decreased in 2024 to 295.0% mainly driven by a decrease in liquid assets.

Risk Management

Effective risk management is of primary importance to CGML's operations. CGML's risk management process has been designed to monitor, evaluate and manage the primary risks it assumes in conducting its activities.

Citi operates under an Enterprise Risk Management Framework ("ERMF") to ensure that all of Citi's risks are managed appropriately and consistently across Citi and at an aggregated, enterprise-wide level. The ERM Framework details the principles used to support effective enterprise-wide risk management across the end-to-end risk management lifecycle.

The underlying pillars of the framework encompass:

- Culture – the core principles and behaviours that underpin a strong culture of risk awareness, in line with Citi's Mission and Value Proposition, and Leadership Principles;
- Governance – the committee structure and reporting arrangements that support the appropriate oversight of risk management activities at the Board and Executive Management Team levels;
- Risk Management – the end-to-end risk management cycle including the identification, measurement, monitoring, controlling and reporting of all risks including emerging, growing, idiosyncratic or otherwise material risks, and aggregated to an enterprise-wide level; and,
- Enterprise Programs – the key risk management programs performed across the risk management lifecycle for all risk categories. These programs also outline the specific roles played by each of the lines of defence in these processes.

The CGML Risk Management Framework has been established to ensure that all CGML's risks are managed appropriately and consistently. The UK CRO owns the CGML Risk Management Framework and is responsible for ensuring that the framework is approved by the UK Risk Management Committee on an annual basis.

CGML's objective is to take prudent risks in support of Citi's aggregate strategy to serve as a trusted partner to its clients, consistent with Citi's Mission and Value Proposition and commitment to Responsible Finance, and to ensure that the risks taken are within our risk appetite, are supported by sufficient capital and liquidity, and are identified, understood, quantified, mitigated and communicated, in line with CGML's Risk Appetite Statement.

Risk Appetite Statement

CGML's Risk Appetite Statement sets a network of high-level boundaries, set by the CGML Board, within which management has discretion to operate. The Risk Appetite Statement is aligned with CGML's strategy and sized in order to allow the entity to execute the strategy within prudential boundaries of risk-taking. Approval for the CGML Risk Appetite Statement is refreshed annually, at a minimum.

The CGML Risk Committee reviews and recommends the CGML Risk Appetite Statement to the CGML Board for approval. Any Board member, CGML Chief Executive Officer ("CEO"), UK CFO and UK CRO can request a refresh at any time for any reason, including for material changes in the risk profile or operating environment.

CGML's Risk Appetite Statement consists of quantitative components and principle-based qualitative components accompanied by risk appetite statements and metrics.

Quantitative Risk Appetite

Quantitative components consist of the following:

- Base Case Capital – CGML's Management Action Trigger ("MAT") Framework defines the levels and actions necessary

at specified capital excess thresholds and is inclusive of triggers defined for Capital, Minimum Requirement for Own Funds and Eligible Liabilities ("MREL") and Leverage; and,

- Stress loss limits and triggers – at entity level, and for market risk and counterparty credit risk.
- Risk appetites are also defined for liquidity risk, operational risk and compliance risk.

The CGML Board holds management accountable for ensuring that CGML's risk profile remains within the boundaries set by the Board.

Qualitative Risk Appetite

The CGML Board has adopted the Citi Risk Appetite Principles outlined below given their global applicability. Given CGML's critical role in implementing Citi's strategy, CGML must be aligned with Citi's Risk Appetite Principles, whilst ensuring that the local assurance mechanisms are in place in order to ensure compliance.

With respect to qualitative risk appetite, the activities that Citi engages in must be consistent with Citi's Mission and Value Proposition and key leadership principles.

Citi's Mission and Value Proposition is to serve as a trusted partner to our clients by responsibly providing financial services that enable growth and economic progress and requires employees to ensure that their decisions pass three tests:

- Are in our clients' interests;
- Create economic value; and,
- Are always systemically responsible.

Primary Risk Categories

CGML's primary risk categories are summarised as follows:

- Credit risk is the risk of loss resulting from the decline in credit quality (or downgrade risk) or failure of a borrower, counterparty, third-party or issuer to honour its financial or contractual obligations;
- Market risk (Trading and Non-Trading): Market risk of trading portfolios is the risk of loss arising from changes in the value of Citi's assets and liabilities resulting from changes in market variables, such as equity and commodity prices or credit spreads. Market risk of non-trading portfolios is the risk to current or projected financial condition and resilience arising from movements in interest rates and resulting from repricing risk, basis risk, yield curve risk and options risk;
- Liquidity risk is the risk that Citi will not be able to efficiently meet both expected and unexpected current and future cash flow and collateral needs without adversely affecting either daily operations or financial conditions of Citi;
- Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. It includes legal risk, which is the risk of loss (including litigation costs, settlements and regulatory fines) resulting from the failure of Citi to comply with laws, regulations, prudent ethical standards and contractual obligations in any aspect of Citi's business, but excludes strategic and reputation risks;
- Compliance risk is the risk to current or projected financial condition and resilience arising from violations of laws, rules or regulations, or from non-conformance with prescribed practices, internal policies and procedures or ethical standards;
- Reputation risk is the risk to current or projected financial conditions and resilience arising from negative public opinion; and,
- Strategic risk is the risk of a sustained impact (not episodic impact) to Citi's core strategic objectives as measured by impacts on anticipated earnings, market capitalisation, or

capital, arising from the external factors affecting the Company's operating environment; as well as the risks associated with defining the strategy and executing the strategy, which are identified, measured and managed as part of the Strategic Risk Framework at the Enterprise Level.

CGML's business is almost entirely wholesale in nature. CGML has a major international presence as a dealer, market maker and underwriter in equity and fixed income securities and offers risk-based solutions to producers, consumers and investors in commodity markets.

CGML also provides advisory services to a wide range of corporate, institutional and government clients. CGML's trading activities encompass cash, exchange traded and OTC derivatives markets. CGML does not originate securitisations or engage in leveraged finance transactions.

CGML's main counterparties, which are also key clients of Citi globally, are banks, investment firms, investment managers, insurers, hedge funds, public sector institutions and corporates.

Risk Management Responsibilities

Risk management must be built on a foundation of ethical culture. Under Citi's Mission and Value Proposition, which was developed by Citi's senior leadership and distributed throughout the firm, Citi strives to serve as a trusted partner to its clients by responsibly providing financial services that enable growth and economic progress while earning and maintaining the public's trust by constantly adhering to the highest ethical standards.

Additionally, Citi evaluates employees' performance against a series of behavioural expectations set out in Citi's leadership standards, which were designed in part to effectuate Citi's Mission and Value Proposition.

Other culture-related efforts in connection with conduct risk, ethics and leadership, escalation and treating customers fairly, also help Citi to execute its Mission and Value Proposition.

Whilst the management of risk is the collective responsibility of all employees, CGML uses a lines of defence model as a key component of its Risk Management Framework to manage its risks. The lines of defence model bring together risk-taking, risk oversight and risk assurance under one umbrella and provides an avenue for risk accountability of first line of defence, a construct for effective challenge by the second line of defence (Independent Risk Management and Independent Compliance Risk Management), and empowers independent risk assurance by the third line of defence (Internal Audit). In addition, Citi has enterprise support functions that support safety and soundness across Citi. Each of the lines of defence and enterprise support functions, along with the Board, are empowered to perform relevant risk management processes and responsibilities in order to manage Citi's risks in a consistent and effective manner.

Citi assigns accountability into the following three lines of defence.

- First line of defence: The business owns the risks and associated controls inherent in, or arising from, the execution of its business activities and is responsible for identifying, measuring, monitoring, controlling and reporting those risks;
- Second line of defence: Citi's independent Risk and Compliance functions are responsible for overseeing the risk-taking activities of the first line of defence and challenging the first line of defence in the execution of its risk management responsibilities. They are also responsible for independently identifying, measuring, monitoring, controlling and reporting aggregate risks and for setting standards for the management and oversight of risk; and,
- Third line of defence: Citi's Internal Audit function independently provides assurance, based on a risk-based

audit plan that processes are reliable and that governance and controls are effective.

Furthermore, the UK CRO as the UK Senior Manager for Risk, and other Risk UK Senior Manager delegates are responsible for the independent review and challenge of the risks facing CGML, including market risk, counterparty credit risk, credit risk, operational risk and liquidity risk. With respect to Compliance Risk, CGML is covered by the UK Chief Compliance Officer, who reports regularly to the Board and Board Audit Committee members.

CGML through its Risk Management Framework and escalation guidelines has developed protocols and processes for prompt and consistent escalation of matters or issues across both financial and non-financial risk types. The early recognition, escalation and resolution of issues or concerns is key to mitigate risks and is critical to CGML's business model. Timely escalation enables the UK Senior Manager to make an informed assessment on the legal entity impact, underlying root causes and required corrective actions. In addition to the timely escalation protocols and process, CGML also has an integrated series of committees across the risk types, that consists of both first line business and second line expertise in their memberships in order to provide oversight of the management and escalation of risks to both the CGML Risk Committee and the Board.

Risk Management Infrastructure

CGML senior management consider the risk management framework and infrastructure as described in this document as being adequate to capture and measure the risks taken on a business as usual basis as a result of the entity's business profile and strategy. In October 2020, Citigroup Inc. and Citibank entered into consent orders with the Federal Reserve Board ("FRB") and Office of the Comptroller of the Currency that require Citigroup Inc. and Citibank to make improvements in various aspects of enterprise-wide risk management, compliance, data quality management and governance and internal controls. These improvements will result in continued significant investments by Citi during 2025 and beyond. As CGML utilises Citi's overarching systems for risk management purposes, CGML is also expected to benefit from the improvements programme.

Stress Testing

The Citi CRO is responsible for monitoring and controlling major risk exposures and concentrations across Citi. This includes the aggregation of risks within and across businesses, as well as subjecting those risks to alternative stress scenarios in order to assess the potential economic impact they may have on Citi. This aggregation is also performed at a CGML level.

Stress tests are undertaken across Citi and CGML, and cover mark-to-market, available-for-sale, and amortised cost portfolios. These firm-wide stress reports seek to measure the potential impact to Citi and CGML and their component businesses, of stresses such as the risk of very large movements in a number of key risk factors (e.g. interest rates, credit spreads), as well as the potential impact of a range of historical and hypothetical forward-looking systemic stress scenarios.

Supplementing the stress testing described above, the UK CRO and Risk Management works with input from the businesses and Finance to provide periodic updates to senior management and the CGML Board on significant potential exposures across CGML arising from risk concentrations, financial market participants and other systemic issues. These risk assessments are forward-looking exercises, intended to inform senior management and the Board about the potential economic impacts to CGML that may occur, directly or indirectly, as a result of hypothetical scenarios, based on judgmental analysis from independent risk managers. The stress testing and risk assessment exercises are a supplement to the standard limit-setting exercises, as these processes incorporate events in the marketplace and within CGML that impact the firm's view of the form, magnitude, correlation and timing of identified risks that may arise. In addition to enhancing awareness

and understanding of potential exposures within CGML, the results of these processes serve as the starting point for the management of risk and mitigation strategies.

Governance Forums and Committees

CGML's Board has overall responsibility for the stewardship of the Company's business and, as a result, is primarily responsible for safeguarding its profitability, financial solvency and assets and for ensuring that it complies with all legal and regulatory requirements, subject to necessary delegations. Further details of the CGML Board can be found in Appendix 1, from page 62.

Committees of the Board include the CGML Risk Committee, the CGML Audit Committee, the CGML Remuneration Committee and the Nomination Committee.

There are a number of governance and control committees that escalate issues to the CGML Board, CGML Audit Committee or CGML Risk Committee. Members of CGML management sit on these committees. The diagram overleaf highlights the main UK governing bodies.

Risk Committee

The Risk Committee is a standing committee of the CGML Board and operates within its charter approved by the Board. The purpose of the Committee is to assist the Board in fulfilling its responsibility with respect to:

- Identification and management of CGML's credit risk, market risk, liquidity risk, operational risk, compliance risk, and emerging risks;
- Approval of CGML's risk appetite statement and oversight of the effectiveness of CGML's risk management framework and internal controls;
- Review the adequacy of the Company's stress testing framework, governance and internal controls;
- Review of regulatory frameworks including (i) the Internal Liquidity Adequacy Assessment ("ILAAP"); (ii) the Liquidity Risk Management Framework (which includes the Liquidity Risk Management Policy and further entity-specific additions); (iii) the Funding & Liquidity Plan; (iv) the Contingency Funding Plan; (v) the Internal Capital Adequacy Assessment Process ("ICAAP"); and (vi) Recovery Plan;
- Assist with ensuring that remuneration is consistent with and promotes sound and effective risk management by way of the Committee Chair's membership of the Remuneration Committee.

The Committee shall comply with all local legal and regulatory requirements concerning membership and independence, including:

- The Committee shall comprise at least three members of the Board, all of which shall be Independent Non-Executive Directors. The Committee's membership consists of William Fall (Chair), Sally Clark, Jonathan Moulds and Iain Plunkett;
- Each member shall meet the independence, experience and expertise requirements of the FCA and PRA and have

sufficient time to discharge the responsibilities of the Committee;

- The members of the Committee and the Committee Chair shall be appointed by, and may be removed by, the Board
- Committee membership and the position of Committee Chair shall be reviewed on a periodic basis and be updated as required; and,
- The UK CRO, UK Head of ORM, CGML CEO, UK CFO and the UK Chief Compliance Officer are permanent attendees at meetings of the Committee. Other members of the Board of CGML have the right to attend meetings of the Committee. Other non-members or other representatives of the Risk function, Compliance and Internal and External Audit, may be invited to attend all or part of any meeting as and when appropriate and necessary.

The CGML Board receive regular reports on any risk matters that need to be brought to their attention via standing forums. In addition, ad-hoc notifications take place via the CGML CEO or UK CRO where escalation is required to the Board, depending on materiality, the criteria for assessing which has been previously presented to and approved by the CGML Risk Committee. The CGML Risk Committee meets at a minimum quarterly, meeting eight times during 2024.

Audit Committee

The effectiveness of CGML's internal control system is reviewed regularly by the Board and the CGML Audit Committee, which receives reports of assessments undertaken by the Internal Audit function. Certain aspects of the internal control system are also subject to regulatory supervision, the results of which are monitored closely by the directors and senior management.

Citi has an established Manager's Control Assessment ("MCA") programme to help managers self-assess key operational risks and controls and to identify and address weaknesses in the design and effectiveness of internal controls that mitigate significant operational risks. The CGML Audit Committee and Directors are also responsible for monitoring the preparation of CGML's financial statements and for reviewing and assessing the independence of the statutory auditor, in particular in the provision by the auditor of additional services to CGML. The CGML Audit Committee meets at a minimum quarterly, meeting six times in 2024.

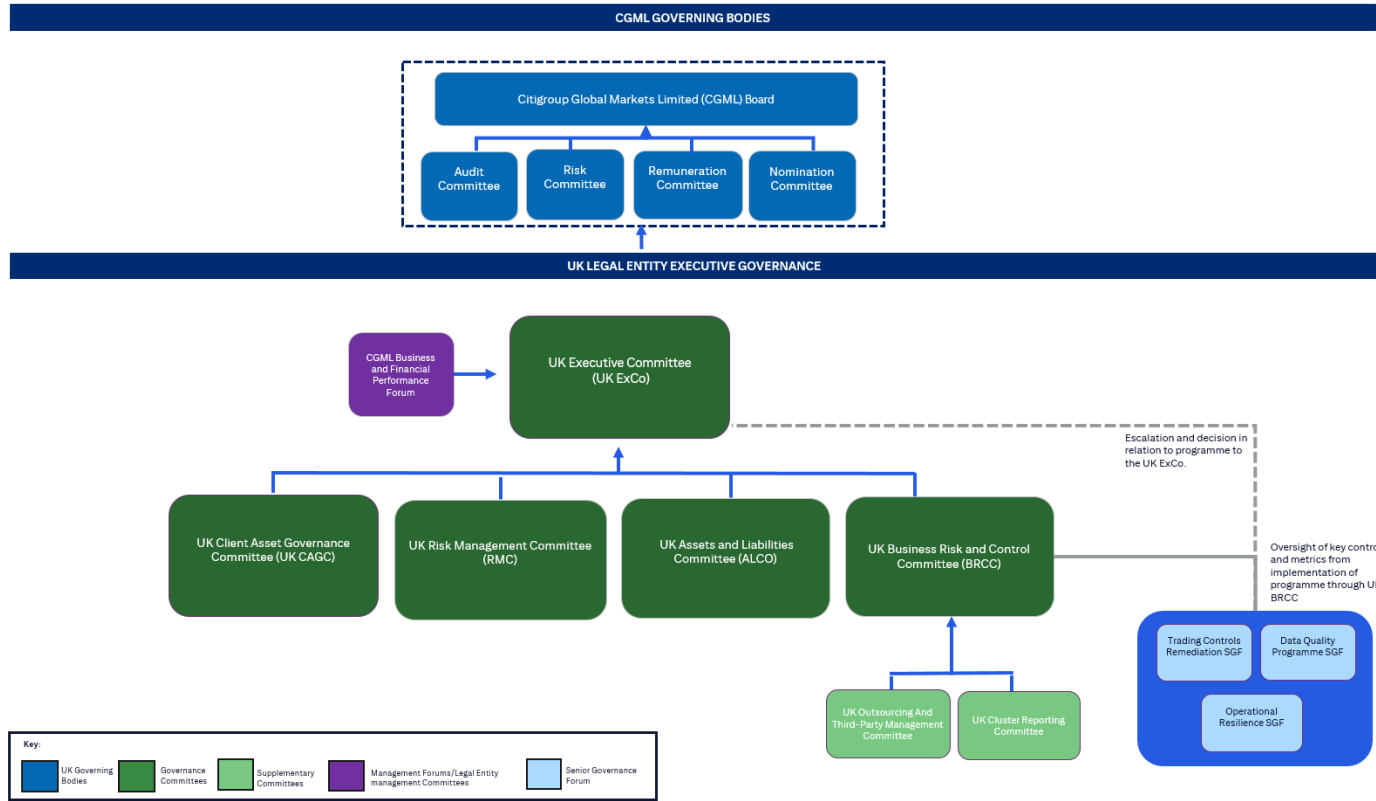
Nomination Committee

The purpose of the CGML Nomination Committee is to monitor the balance of skills, knowledge and experience on the Board and to make recommendations for changes as appropriate to the Board. The Committee is also responsible for succession planning of the Board and Executive Management. The CGML Nomination Committee held four meetings during 2024.

CGML Remuneration Committee

The CGML Remuneration Committee is a standing committee of the CGML Board, further details of the committee can be found on page 51.

UK Legal Entity Governance Overview



Linkage to Financial Reporting

As permitted under section 401 of the Companies Act 2006, consolidated financial statements have not been prepared as CGML is a wholly owned subsidiary of the ultimate parent, Citigroup Inc. which prepares consolidated financial statements under US Generally Accepted Accounting Principles ("GAAP"). CGML meets the criteria for exemption from the obligation to prepare and deliver group accounts available to a company included in Non-European Economic Area ("Non-EEA") group accounts of a larger group.

CGML's financial statements therefore present information about the Company as an individual undertaking and not about its group. As such, any references to accounting values or carrying values as published in financial statements within this disclosure represent CGML's consolidated group Financial Reporting Standards ("FINREP").

CGML's Pillar 3 disclosures are made in accordance with regulatory capital and liquidity rules and concepts. CGML's FINREP reporting and financial statements are prepared in accordance with International Financial Reporting Standards ("IFRS"). The tables presented in this section outline the method of accounting and regulatory consolidation, and provide a breakdown of the carrying amounts reported under the scope of regulatory consolidation to the different regulatory risk categories.

Table 2: Outline of the differences in the Scopes of Consolidation (Entity by Entity) (UK LI3)

Name of the Entity	Method of Accounting Consolidation	Method of Regulatory Consolidation			Deducted	Description of the Entity
		Full Consolidation	Proportional Consolidation	Neither Consolidated nor Deducted		
Citigroup Global Markets Limited (CGML)	Fully Consolidated	X				Investment Firm
Citigroup Global Markets Europe AG (Germany)	Fully Consolidated	X				Investment Firm
Citigroup Global Markets Funding Luxembourg SCA	Fully Consolidated	X				Investment Firm
Citigroup Global Markets Funding Luxembourg GP S.a.R.L.	Not Consolidated				X	Investment Firm

¹ Entities below materiality threshold have not been consolidated for FINREP and are deducted from capital in the regulatory consolidation.

Table 3: Differences between Accounting and Regulatory Scopes of Consolidation and the Mapping of Financial Statement Categories with Regulatory Risk Categories (UK LI1)

	Carrying values of items						Not subject to capital requirements or subject to deduction from capital
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to the credit risk framework ¹	Subject to the CCR framework	Subject to the securitisation framework ²	Subject to the market risk framework	
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
Assets							
Financial assets at amortised cost: Cash at bank and in hand	9,076	9,076	9,076	—	—	—	—
Financial assets at amortised cost: Collateralised financing transactions	93,431	93,431	—	93,431	—	93,431	—
Financial assets at fair value through profit or loss - derivatives	203,548	203,548	—	203,548	—	203,548	—
Financial assets at fair value through profit or loss - inventory	59,637	59,637	—	59,597	7	59,597	33
Financial assets designated at fair value through profit or loss	49,928	49,928	—	49,928	—	49,928	—
Equity securities held for investment	107	107	107	—	—	—	—
Pension	1,308	1,308	1,026	—	—	—	282
Other Assets	37,837	37,837	1,695	35,752	—	6,075	389
Total assets as at 31 December 2024	454,872	454,872	11,904	442,257	7	412,579	704
Liabilities							
Financial liabilities at amortised cost: bank loans and overdrafts	895	895	—	—	—	—	895
Financial liabilities at amortised cost: Collateralised financing transactions	70,496	70,496	—	70,496	—	70,496	—
Financial liabilities at fair value through p&l - derivatives	201,826	201,826	—	201,826	—	201,826	—
Financial liabilities at fair value through p&l - securities sold but not yet purchased	32,543	32,543	—	32,543	—	32,543	—
Financial liabilities designated at fair value through p&l	44,091	44,091	—	44,091	—	44,091	—
Other Liabilities	63,669	63,669	—	28,453	—	22,339	12,846
Subordinated Loans	12,097	12,097	—	—	—	—	12,097
Total liabilities as at 31 December 2024	425,616	425,616	—	377,408	—	371,294	25,838

¹ Items subject to credit risk framework: Carrying values included in this column are based on banking book assets.

² Items subject to securitisation framework: Carrying value included in this column show the banking book securitisation positions. Trading book securitisation positions are included under the market risk framework in line with PRA requirements.

Table 4: Main Sources of differences between Regulatory Exposure Amounts and Carrying Values in Financial Statements (UK LI2)

This table provides a reconciliation between assets carrying values under the regulatory scope of consolidation as per Table 3 and the exposures used for regulatory purposes, split as per the regulatory risk framework.

	Items subject to				
	Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
	\$ million	\$ million	\$ million	\$ million	\$ million
1 Assets carrying value amount under the scope of regulatory consolidation (as per template LI1)	454,168	11,904	7	442,257	412,579
2 Liabilities carrying value amount under the regulatory scope of consolidation (as per template LI1)	399,778	—	—	377,408	371,294
3 Total net amount under the regulatory scope of consolidation	54,389	11,904	7	64,848	41,285
4 Off-balance-sheet amounts	—	—	—	—	
5 Differences in valuations ²	(865)	(865)	—	—	
6 Differences due to different netting rules, other than those already included in row 2 ¹	8,199	—	—	8,199	
8 Differences due to the use of credit risk mitigation techniques (CRMs)	(2,000)	(2,000)	—	—	
11 Other differences ³	61,955	5,379	—	56,576	
12 Exposure amounts considered for regulatory purposes	144,048	14,418	7	129,623	41,285

¹Differences primarily attributable to carrying value for assets under IFRS differ from exposure for regulatory reporting purposes, such as modelled exposures, potential future exposure ("PFE") for counterparty credit risk and netting under master netting agreement. Carrying value does not take into account Credit Risk Mitigation ("CRM") or regulatory volatility adjustments such as currency and maturity mismatch.

²Represents differences in netting for SFT transactions whereby balance sheet netting occurs where there is legal certainty to offset cash flows where balances are settled on a net basis. Collateral recognition recognised in regulatory capital is achieved only where legal effective and enforceability is in place.

³Other differences represent discrepancies in the framework relating to the use of modelling approaches for regulatory purposes as well as regulatory adjustments due to collateral haircuts and prudent valuation adjustments for fair valued trading book positions for CGML.

Table 5: Reconciliation of regulatory own funds to balance sheet in the audited financial statements (UK CC2)

		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference to UK CC1 template
		As at period end	As at period end	
Assets - Breakdown by asset class according to the balance sheet in the published financial statements				
		\$ million	\$ million	
1	Financial assets at amortised cost: Cash at bank and in hand	9,076	9,076	
2	Financial assets at amortised cost: Collateralised financing transactions	93,431	93,431	
3	Financial assets at fair value through profit or loss - derivatives	203,548	203,548	
4	Financial assets at fair value through profit or loss - inventory	59,637	59,637	
4a	of which: securitisation positions deducted from Own Funds	33	33	(f)
5	Financial assets designated at fair value through profit or loss	49,928	49,928	
6	Equity securities held for investment	107	107	
7	Pension	1,308	1,308	
7a	of which: Defined-benefit pension fund assets	282	282	(e)
8	Other Assets	37,837	37,837	
8a	of which: Intangible assets (net of related tax liability)	375	375	(c)
8b	of which: free deliveries (negative amount)	14	14	(g)
9	Total assets	454,872	454,872	
Liabilities - Breakdown by liability class according to the balance sheet in the published financial statements				
1	Financial liabilities at amortised cost: bank loans and overdrafts	895	895	
2	Financial liabilities at amortised cost: Collateralised financing transactions	77,283	77,283	
3	Financial liabilities at fair value through p&l - derivatives	201,826	201,826	
3a	of which: Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	(62)	(62)	(d)
4	Financial liabilities at fair value through p&l - securities sold but not yet purchased	32,573	32,573	
5	Financial liabilities designated at fair value through p&l	66,430	66,430	
6	Other Liabilities	34,513	34,513	
7	Subordinated Loans	12,097	12,097	
7a	of which: Tier 2 capital	2,600	2,600	(j)
8	Total liabilities	425,616	425,616	
Shareholders' Equity				
1	Called up share capital	20,999	20,999	(a)
2	Other equity instruments	4,300	4,300	(i)
3	Capital reserve	—	—	
4	Retained earnings and other reserves	3,957	3,957	(b)
4a	of which: Other regulatory adjustments to CET1 capital (including IFRS 9 transitional adjustments when relevant)	101	101	(h)
5	Total shareholders' equity	29,256	29,256	

Own Funds

Table 6: Composition of regulatory own funds (UK CC1)

This template is prepared in accordance with Annex VII of the PRA rulebook and presents CGML's consolidated regulatory own funds as at 31 December 2024.

	31 December 2024	Reference to UK CC2 table	31 December 2023
	\$ million		\$ million
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1 Capital instruments and the related share premium accounts	20,999	(a)	20,999
2 Retained earnings ¹	2,751	(b)	3,028
3 Accumulated other comprehensive income (and other reserves)	811	(b)	938
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	24,561		24,966
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7 Additional value adjustments (negative amount)	(865)		(756)
8 Intangible assets (net of related tax liability) (negative amount)	(375)	(c)	(332)
14 Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	62	(d)	(141)
15 Defined-benefit pension fund assets (negative amount)	(282)	(e)	(240)
UK-20a Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(47)		(75)
UK-20c of which: securitisation positions (negative amount)	(33)	(f)	(40)
UK-20d of which: free deliveries (negative amount)	(14)	(g)	(35)
27a Other regulatory adjustments to CET1 capital (including IFRS 9 transitional adjustments when relevant)	(101)	(h)	(8)
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	(1,608)		(1,552)
29 Common Equity Tier 1 (CET1) capital	22,952		23,429
Additional Tier 1 (AT1) capital: instruments			
30 Capital instruments and the related share premium accounts	4,300	(i)	4,300
36 Additional Tier 1 (AT1) capital before regulatory adjustments	4,300		4,300
Additional Tier 1 (AT1) capital: regulatory adjustments			
44 Additional Tier 1 (AT1) capital	4,300		4,300
45 Tier 1 capital (T1 = CET1 + AT1)	27,252		27,729
Tier 2 (T2) capital: instruments			
46 Capital instruments and the related share premium accounts ²	2,172	(j)	2,493
51 Tier 2 (T2) capital before regulatory adjustments	2,172		2,493
Tier 2 (T2) capital: regulatory adjustments			
57 Total regulatory adjustments to Tier 2 (T2) capital	—		—
58 Tier 2 (T2) capital	2,172		2,493
59 Total capital (TC = T1 + T2)	29,425		30,222
60 Total Risk exposure amount	146,156		154,458
Capital ratios and buffers			
61 Common Equity Tier 1 (as a percentage of total risk exposure amount)	15.7%		15.2%
62 Tier 1 (as a percentage of total risk exposure amount)	18.6%		18.0%
63 Total capital (as a percentage of total risk exposure amount)	20.1%		19.6%
64 Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD expressed as a percentage of risk exposure amount)	9.3%		9.2%
65 of which: capital conservation buffer requirement	2.5%		2.5%
66 of which: countercyclical buffer requirement	0.9%		0.8%
68 Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	9.7%		9.1%
Amounts below the thresholds for deduction (before risk weighting)			
72 Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	1,788		1,645
73 Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	—		—
75 Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	285		183
Applicable caps on the inclusion of provisions in Tier 2	—		—
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)	—		—

¹Please note for reference (b), the difference between tables CC1 and CC2 primarily reflects recognition of foreseeable dividends per Article 26 of the CRR for the purposes of Regulatory Own Funds.

²Please note for reference (j), the difference between tables CC1 and CC2 reflects the impact of prudential amortisation of Tier 2 instruments.

CGML's total capital decreased by \$0.8 billion year on year, driven by a reduction in retained earnings reflecting foreseeable dividends per Article 26 of the CRR, with a further \$0.3 billion reduction across Tier 2 capital instruments due to prudential amortisation.

Details of the main features, terms and conditions of CGML's capital instruments including eligible liabilities are outlined in Appendix 2.

Capital Requirements and Buffers

CGML complies with the minimum Pillar 1 capital requirements, with its capital requirements primarily consisting of credit risk, counterparty credit risk, credit valuation adjustment, securitisation, market risk, large exposures in the trading book and operational risk.

CGML uses a combination of standardised and internal model approaches, in line with its regulatory permissions, to calculate its Pillar 1 capital requirements. Details of the approaches used to calculate Exposure at Default ("EAD") and RWA are provided in the below table. Where own funds requirements are presented in these disclosures, this represents the minimum Pillar 1 capital charge of 8% of RWAs.

In addition to minimum Pillar 1 capital requirements, CGML is also required to capitalise for Pillar 2 capital requirements and regulatory capital buffers.

Additionally, CGML is required to hold capital buffers including the capital conservation buffer of 2.5% and the institution-specific countercyclical capital buffer ("CCyB"). Further details of CGML's CCyB is disclosed in Appendix 3.

Detail concerning CGML's approach to capital management and its Pillar 2 capital requirements is included later in this section.

Risk Category	Definitions	Regulatory Exposure Calculation Methods	RWA Approach
Credit Risk	Credit risk is the risk that counterparties may be unable or unwilling to make a payment or fulfil contractual obligations. This may be characterised in terms of an actual default or by deterioration in a counterparty's credit quality. The former case may result in an actual and immediate loss, whereas in the latter case, future losses may become more likely.	Credit Risk exposures are captured as accounting value, net of general and specific credit risk adjustments.	
Counterparty Credit Risk	Counterparty credit risk is the risk that the counterparty to a transaction will default before the final settlement of the transaction's cash flows.	CGML adopts three methods for calculating Counterparty Credit Risk ("CCR") exposures: • Internal model method ("IMM") - applies to OTC derivatives as approved by the regulator; • Standardised approach for counterparty credit risk ("SA-CCR") - applies to exchange traded derivatives and non-IMM approved OTC derivatives; and, • Financial collateral comprehensive method ("FCCM") - applies to SFTs.	CGML uses the standardised approach to determine credit and counterparty credit risk capital requirements, based on External Credit Assessment Institution ("ECAI") ratings for calculating RWAs, further detailed in table 28.
Credit Valuation Adjustment	The CVA represents a portfolio-level adjustment to reflect the risk premium associated with the counterparty's non-performance risk.	CGML uses a combination of Advanced and Standardised calculations for CVA.	Standardised Approach: computation includes factors based on ECAI ratings and effective maturity Advanced Approach: the computation of expected exposure is based on our IMM model and the calculation of the CVA requirement is then generated utilising VaR.
Securitisation	A securitisation is a transaction or scheme where the associated credit risk of the exposure or pool of exposures is tranching, where key features include: • the tranching reflects subordination of the distribution of losses on the transaction or scheme; • the payments in the transaction or scheme rely on the exposure or pool of exposures' performance.	Securitized exposures from traditional securitisations are captured as the accounting value after relevant specific credit risk adjustments for on-balance sheet securitisation position for both trading and non-trading book exposures.	Under the revised securitisation framework, CGML risk weights relevant positions using the Standardised Approach ("SEC-SA") and External Ratings Based Approach ("SEC-ERBA").
Market Risk	Market risk is the risk to earnings from adverse changes in market factors such as interest rates, equity prices, commodity prices, foreign exchange rates, credit spreads and their implied volatilities.	Market Risk positions are based on accounting values and notional in both trading and non-trading books.	CGML uses a Value at Risk ("VaR") model to calculate market risk capital requirements for its trading portfolio in line with an Internal Model Permission granted by the PRA. The permission covers VaR, Stressed VaR ("SVaR") and the Incremental Risk Charge ("IRC"). For all other positions, these are captured under the Standardised Approach.
Large Exposures	Large exposures captures single name concentration risk. Any exposure to a counterparty or group of connected counterparties which is equal to or exceeds 10% of the firm's eligible capital constitutes a large exposure.	Exposures are broadly consistent with the assessment of credit and counterparty credit risk in the trading and non-trading books. Issuer risk exposures are also included.	Large Exposure capital requirements are calculated on the trading book excess.
Operational Risk	Operational risk captures the loss resulting from inadequate or failed internal processes, people and systems or from external events.	N/A	CGML uses a combination of Advanced Measurement Approach ("AMA") and Standardised Approach. AMA is based on a permission granted by the PRA. Under the standardised approach, activities are divided into individual business lines for calculation of operational risk.

Table 7: Overview of risk weighted exposure amounts (UK OV1)

		31 December 2024	31 December 2023	31 December 2024
		RWAs	RWAs	Total own funds requirements
		\$ million	\$ million	\$ million
1	Credit risk (excluding CCR)	6,496	6,949	520
2	Of which the standardised approach	6,496	6,949	520
3	Of which the Foundation IRB (F-IRB) approach	—	—	—
4	Of which: slotting approach	—	—	—
UK 4a	Of which: equities under the simple risk weighted approach	—	—	—
5	Of which the Advanced IRB (A-IRB) approach	—	—	—
6	Counterparty credit risk - CCR	68,580	76,642	5,486
7	Of which the standardised approach	18,613	19,279	1,489
8	Of which internal model method (IMM)	15,054	15,468	1,204
UK 8a	Of which exposures to a CCP	1,360	2,442	109
UK 8b	Of which credit valuation adjustment - CVA	4,781	6,755	382
9	Of which other CCR	28,772	32,696	2,302
15	Settlement risk	197	155	16
16	Securitisation exposures in the non-trading book (after the cap)	57	103	5
17	Of which SEC-IRBA approach	—	—	—
18	Of which SEC-ERBA (including IAA)	57	100	5
19	Of which SEC-SA approach	—	2	—
UK 19a	Of which 1250% / deduction	—	—	—
20	Position, foreign exchange and commodities risk (Market risk)	44,863	45,899	3,589
21	Of which the standardised approach	22,951	25,840	1,836
22	Of which IMA	21,912	20,059	1,753
UK 22a	Large exposures	—	—	—
23	Operational risk	25,964	24,089	2,077
UK 23a	Of which basic indicator approach	—	—	—
UK 23b	Of which standardised approach	1,301	1,026	104
UK 23c	Of which advanced measurement approach	24,663	23,063	1,973
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	711	457	57
25	Other Risk Exposure Amounts¹	—	622	—
29	Total	146,156	154,458	11,692

¹Other risk exposure amounts include additional risk exposure amount due to Article 3 of CRR.

Credit Risk

Credit risk RWAs decreased by \$0.5 billion reflecting a decrease in on-balance sheet exposures.

Counterparty Credit Risk

Counterparty credit risk RWAs decreased by \$8.1 billion primarily driven by a decrease in Derivatives and SFTs due to business activity and the impact of market movements.

Market Risk

Market risk RWAs decreased by \$1.0 billion, reflecting a reduction across Foreign Exchange ("FX") and Equity risk under the Standardised Approach, partially offset by an increase under the Internal Model Approach ("IMA").

Operational Risk

Operational risk RWAs increased by \$1.9 billion year on year driven by parameter changes under the advanced measurement approach.

Table 8: RWA flow statements of CCR exposures under the IMM (UK CCR7)

This table presents a flow statement explaining changes in the CCR RWAs determined under the IMM for Counterparty Credit Risk excluding exposures cleared through a Central Counterparty ("CCP").

		RWA
		\$ million
1	RWA as at 31 December 2023	15,468
2	Asset size	(548)
3	Credit quality of counterparties	57
4	Model updates (IMM only)	77
5	Methodology and policy (IMM only)	—
6	Acquisitions and disposals	—
7	Foreign exchange movements	—
8	Other	—
9	RWA as at 31 December 2024	15,054

CCR RWAs under IMM decreased by \$0.4 billion primarily driven by a reduction in asset size partially offset by increases resulting from model updates or deterioration in credit quality of counterparties.

Table 9: RWA Flow Statements of Market Risk Exposures under the IMA (UK MR2-B)

The table presents a flow statement explaining variations in the market risk RWAs.

	VaR	SVaR	IRC	Comprehensive risk measure	Other ¹	Total RWAs	Total own funds requirements
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 RWAs as at 31 December 2023	3,340	6,960	5,916	—	3,843	20,059	1,605
1a Regulatory adjustment	(2,497)	(5,040)	—	—	(909)	(8,446)	(676)
1b RWAs at the previous quarter-end	843	1,920	5,916	—	2,934	11,613	929
2 Movement in risk levels	337	67	(1,118)	—	(677)	(1,392)	(111)
3 Model updates/changes	(59)	(26)	171	—	89	175	14
4 Methodology and policy	—	—	—	—	—	—	—
5 Acquisitions and disposals	—	—	—	—	—	—	—
6 Foreign exchange movements	—	—	—	—	—	—	—
7 Other	—	—	—	—	—	—	—
8a RWAs at the end of the disclosure period	1,121	1,960	4,969	—	2,346	10,397	832
8b Regulatory adjustment	2,187	6,758	767	—	1,803	11,515	921
8 RWAs as at 31 December 2024	3,308	8,718	5,736	—	4,150	21,912	1,753

¹Other category includes Risks Not in Model ("RNIM").

RWAs under the internal model approach increased over the year, primarily for Stressed VaR and Risks not in Model.

Capital Management

CGML's capital management is centred on current and prospective business activities, risk profile, capital capacity as well as meeting local regulatory capital requirements and responding to the changing regulatory landscape. The key activities undertaken within its capital management framework to reflect this approach include:

- An annual strategic capital planning process to determine legal entity capital usage and business specific regulatory capital targets across the planning horizon.
- Daily monitoring and reporting of capital metrics to senior management, against legal entity and business-level internal management thresholds, in line with global capital policies and standards.
- Robust stress testing to assess CGML's ability to withstand, and where necessary recover from, stresses of increasing severity across the planning continuum.

CGML also conducts an Internal Capital Adequacy Assessment Process ("ICAAP") at least annually, setting out its local capital requirements and associated policies and procedures. The ICAAP is key for CGML's management and decision making and helps inform the CGML Board of Directors and executive management of CGML's capital adequacy on a forward looking basis. The ICAAP is a comprehensive exercise, and includes:

- Assessment of Pillar 2A capital requirements defined as risks not adequately captured by the Pillar 1 framework. Through its Supervisory Review and Evaluation Process ("SREP"), the PRA has set CGML a variable Pillar 2A capital requirement of 2.45%, equivalent to a Total Capital Requirement (the sum of Pillar 1 and Pillar 2A requirements) of 10.45% as of 31 December 2024.
- Assessment of a Pillar 2B capital buffer, which is determined in line with PRA guidance on the capital buffer required to withstand the impact of a severe but plausible stress on its ability to meet its Total Capital Requirement.

All the aforementioned tools are monitored and controlled through regular meetings of the UK Prudential Resource Forum ("PRF") UK Resource Management Forum and monthly UK Asset and Liability Committee ("UK ALCO"). The UK PRF and UK Resource Management Forum make recommendations for approval, proposals for consideration, and notifications of relevance to the UK ALCO.

The UK ALCO is the primary balance sheet and liquidity governance committee of CGML which meets monthly, and responsibilities include:

- The UK ALCO committee's remit includes oversight of CGML's balance sheet management, liquidity and capital levels, local regulatory requirements related to the Balance Sheet, oversight of market and foreign exchange risks of non-trading portfolios, and monitoring of Treasury management limits, targets, and ratios;
- The committee reviews and approves key regulatory documents such as ICAAP and ILAAP before these are submitted to the Board for approval;
- The committee ensures adherence to capital standards, determines dividend repatriation, and monitors local capital hedging and investment;
- CGML senior management through UK ALCO monitors changes in the economic environment and any corresponding impact on the asset quality of CGML's balance sheet and the prudential adequacy of CGML; and,
- Membership of the UK ALCO includes the CGML CEO & UK Chief Country Officer, UK CFO, UK Treasurer, UK CRO, second line of defence and other key business and functional heads.

There are no current or foreseen material practical or legal impediment to the prompt transfer of own funds or repayment of liabilities among CGML and its subsidiaries.

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 10: Leverage ratio common disclosure (UK LR2 – LRCom)

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

		31 December 2024	31 December 2023
		\$ million	\$ million
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	95,027	88,159
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	—	—
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(13,490)	(16,850)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	—	—
5	(General credit risk adjustments to on-balance sheet items)	—	—
6	(Asset amounts deducted in determining tier 1 capital (leverage))	(1,489)	(1,310)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	80,048	69,999
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	16,658	19,936
UK-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	—	—
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	52,389	57,659
UK-9a	Derogation for derivatives: potential future exposure contribution under the simplified standardised approach	—	—
UK-9b	Exposure determined under the original exposure method	—	—
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	(4,936)	(9,706)
UK-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	—	—
UK-10b	(Exempted CCP leg of client-cleared trade exposures) (original exposure method)	—	—
11	Adjusted effective notional amount of written credit derivatives	761,351	666,978
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	(731,863)	(609,332)
13	Total derivatives exposures	93,600	125,536
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	240,067	349,511
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(93,209)	(123,965)
16	Counterparty credit risk exposure for SFT assets	14,349	19,258
UK-16a	Derogation for SFTs: counterparty credit risk exposure in accordance with Articles 429e(5) and 222 of the CRR	—	—
17	Agent transaction exposures	—	—
UK-17a	(Exempted CCP leg of client-cleared SFT exposures)	—	—
18	Total securities financing transaction exposures	161,207	244,805
Capital and total exposure measure			
23	Tier 1 capital (leverage)	27,252	27,729
24	Total exposure measure including claims on central banks	334,856	440,340
UK-24a	(-) Claims on central banks excluded	(4,198)	(3,100)
UK-24b	Total exposure measure excluding claims on central banks	330,658	437,240
Leverage ratio			
25	Leverage ratio excluding claims on central banks (%)	8.2%	6.3%
UK-25a	Fully loaded ECL accounting model leverage ratio excluding claims on central banks (%)	8.2%	6.3%
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 (%)	8.1%	6.3%
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	372,003	444,459
UK-32	Average total exposure measure excluding claims on central banks	367,731	441,482
UK-33	Average leverage ratio including claims on central banks	7.3%	6.1%
UK-34	Average leverage ratio excluding claims on central banks	7.4%	6.1%

CGML's Leverage ratio increased by 1.9% to 8.2% as at 31 December 2024, primarily reflecting a \$106.6 billion decrease in total leverage exposure measure. This is driven by a reduction of SFT assets on the Balance Sheet resulting from changes in business and client activities, in addition to a decrease across Credit Derivatives following the implementation of enhanced netting.

The following tables provide further information concerning our leverage exposures, including a reconciliation of total assets under our balance sheet (represented as per FINREP reporting) and total leverage exposures, and secondly a breakdown of on-balance sheet excluding derivatives, SFTs and exempted exposures by asset class.

Table 11: Summary reconciliation of accounting assets and leverage ratio exposures (UK LR1 – LRSum)

		31 December 2024
		\$ million
1	Total assets as per published financial statements	454,872
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	—
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	—
4	(Adjustment for exemption of exposures to central banks)	(4,198)
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) of the CRR)	—
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	—
7	Adjustment for eligible cash pooling transactions	—
8	Adjustment for derivative financial instruments	(109,865)
9	Adjustment for securities financing transactions (SFTs)	14,349
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	345
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced tier 1 capital (leverage))	—
UK-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point I of Article 429a(1) of the CRR)	—
UK-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) of the CRR)	—
12	Other adjustments	(24,845)
13	Total exposure measure	330,658

Table 12: Split-up of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures) (UK LR3 – LRSpl)

		31 December 2024
		\$ million
UK-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	98,483
UK-2	Trading book exposures	84,744
UK-3	Banking book exposures, of which:	13,739
UK-4	Covered bonds	—
UK-5	Exposures treated as sovereigns	4,762
UK-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	—
UK-7	Institutions	4,872
UK-8	Secured by mortgages of immovable properties	—
UK-9	Retail exposures	—
UK-10	Corporate	1,467
UK-11	Exposures in default	—
UK-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	2,639

Management of Excessive and Contingent Leverage

Excessive leverage is defined as the risk resulting from vulnerability due to financial leverage or conditional leverage that may require unintended corrective actions of business plans, including emergency sale of assets which could result in losses or result in the need for valuation adjustments of other assets.

CGML monitors its Leverage Ratio through internal daily reporting activities and is controlled and reported through the UK Prudential Resource Forum and UK ALCO. As part of the broader capital management framework, the UK ALCO has also approved a Management Action Trigger for CGML's Leverage Ratio.

Furthermore, CGML includes the leverage ratio in its capital planning activities under both base and stressed conditions.

Contingent leverage risk is the risk that CGML needs to replace the positions, which carry a low leverage exposure with positions that carry a high leverage exposure measure due to a change in market conditions, counterparty default, or shift in portfolio composition.

For CGML, contingent leverage risk is unlikely to be material for given that its leverage ratio is above 5.0%, giving the entity significant capacity to absorb incremental leverage exposure and remain above the regulatory requirement of 3.25%.

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 December 2024, CGML had own funds and eligible liabilities in excess of its internal MREL requirement.

Table 13: Key Metrics – MREL requirements (KM2)

	\$ million	31 December 2024	30 September 2024	30 June 2024	31 March 2024	31 December 2023
1	Total MREL available	37,552	37,686	38,751	38,790	38,829
2	Total RWA	146,156	154,534	152,533	159,405	154,458
3	MREL as a percentage of RWA (%)	25.7%	24.4%	25.4%	24.3%	25.1%
4	Leverage exposure measure	330,658	374,851	428,025	464,472	437,240
5	MREL as a percentage of leverage exposure measure (%)	11.4%	10.1%	9.1%	8.3%	8.9%

Table 14: MREL composition (MREL1)

The table below provides details of the composition of CGML's internal MREL eligible instruments.

	31 December 2024	31 December 2023
	\$ million	\$ million
Regulatory capital elements of MREL and adjustments		
1 Common Equity Tier 1 (CET1) capital	22,952	23,429
2 Additional Tier 1 (AT1) capital before MREL adjustments	4,300	4,300
3 AT1 capital ineligible as MREL as issued out of subsidiaries to third parties	—	—
4 Other adjustments	—	—
5 AT1 instruments eligible under the MREL framework	4,300	4,300
6 Tier 2 (T2) capital before MREL adjustments	2,600	2,600
7 Amortised portion of Tier 2 instruments where remaining maturity > 1 year	—	—
8 Tier2 capital ineligible as MREL as issued out of subsidiaries to third parties	—	—
9 Other adjustments	—	—
10 Tier2 instruments eligible under the MREL framework	2,600	2,600
11 MREL arising from regulatory capital	29,852	30,329
Non-regulatory capital elements of MREL		
12 Internal MREL instruments issued directly by the entity and subordinated to excluded liabilities	7,700	8,500
13 Internal MREL instruments issued directly by the entity which are not subordinated to excluded liabilities but meet all other MREL Term Sheet requirements	—	—
17 MREL arising from non-regulatory capital instruments before adjustments	7,700	8,500
Non-regulatory capital elements of MREL: adjustments		
18 MREL before deductions	37,552	38,829
19 Deductions of exposures between MPE resolution groups that correspond to items eligible for MREL (not applicable to single point of entry G-SIBs)	—	—
20 Deduction of investments in own other MREL liabilities	—	—
21 Other adjustments to MREL	—	—
22 MREL after deductions	37,552	38,829
Risk-weighted assets (RWA) and leverage exposure measure for MREL purposes		
23 Total RWA adjusted as permitted under the MREL regime	146,156	154,458
24 Leverage exposure measure	330,658	437,240
MREL ratios and buffers		
25 MREL (as a percentage of RWA adjusted as permitted under the MREL regime)	25.7%	25.1%
26 MREL (as a percentage of leverage exposure)	11.4%	8.9%
27 CET1 (as a percentage of RWA) available after meeting the entity's minimum capital and MREL requirements ¹	10.0%	8.9%
28 Bank-specific buffer requirement (capital conservation buffer plus countercyclical buffer requirements plus higher loss-absorbency requirement, expressed as a percentage of RWA)	3.4%	3.3%
29 Of which: capital conservation buffer requirement	2.5%	2.5%
30 Of which: bank-specific countercyclical buffer requirement	0.9%	0.8%

¹The calculation in row 27 has been updated for 2024 to reflect the Bank of England minimum MREL requirement rather than the previously more binding requirement under Article 92(b) which is no longer applicable. Prior period has not been restated on the same basis.

Table 15: MREL Creditor Ranking (MREL2)

The following table provides a breakdown of eligible instruments in the creditor hierarchy of CGML.

		Creditor ranking				Total as at 31 December 2024
		(most junior)			(most senior)	
		1	2	3	4	
		\$ million	\$ million	\$ million	\$ million	\$ million
1	Is the resolution entity the creditor/investor? (yes or no)	Yes	Yes	Yes	Yes	
2	Description of creditor ranking	Ordinary Shares	AT1	Subordinated Loans	Senior Subordinated Loans	
3	Total capital and liabilities net of credit risk mitigation	20,999	4,300	2,600	7,700	35,599
4	Subset of row 3 that are excluded liabilities	—	—	—	—	—
5	Total capital and liabilities less excluded liabilities (row 3 minus row 4)	20,999	4,300	2,600	7,700	35,599
6	Subset of row 5 that are eligible as MREL	20,999	4,300	2,600	7,700	35,599
7	Subset of row 6 with 1 year ≤ residual maturity < 2 years	—	—	—	—	—
8	Subset of row 6 with 2 years ≤ residual maturity < 5 years	—	—	1,600	2,500	4,100
9	Subset of row 6 with 5 years ≤ residual maturity < 10 years	—	—	—	5,200	5,200
10	Subset of row 6 with residual maturity ≥ 10 years, but excluded perpetual securities	—	—	1,000	—	1,000
11	Subset of row 6 that is perpetual securities	20,999	4,300	—	—	25,299

Credit Risk

Credit risk is the risk of loss resulting from the decline in credit quality (or downgrade risk) or failure of a borrower, counterparty, third-party or issuer to honour its financial or contractual obligations.

CGML has a major international presence as a dealer, market maker and underwriter in equity and fixed income securities and offers risk-based solutions to producers, consumers and investors. CGML also provides advisory services to a wide range of corporate, institutional and government clients. CGML's trading activities encompass cash, exchange traded and OTC derivative markets. CGML does not act as sponsor to securitisations or engage in leveraged finance transactions as principal.

CGML's business is almost entirely wholesale in nature. CGML's major counterparties are banks, investment banks, investment managers, insurers, public sector, corporates, funds and hedge funds.

CGML uses Citi's over-arching organisation, with its multi-dimensional risk oversight, people, processes and systems to ensure robust oversight of the material risks.

Citi has a well-established framework for managing credit risk across all businesses. This includes a defined risk appetite, credit limits and credit policies. Citi's credit risk management also includes processes and policies with respect to problem recognition, including 'watchlists', portfolio review, updated risk ratings and classification triggers. The framework is supplemented by regular stress testing and monitoring of exposures, with monthly and quarterly reporting to senior management and the CGML Board respectively, through the established governance processes.

CGML's Risk Management Framework documents the risk management approach used to ensure robust management of the material risks facing the CGML legal entity. The Credit Risk section of this framework sets out the governance structure for taking the credit risk on CGML and the approaches to managing both wholesale lending credit risk and counterparty credit risk.

An explanation of Citi's approach to managing credit risk can be found in "Managing Global Risk – Credit Risk" in Citi's 31 December 2024 Form 10-K, available at: <https://www.citigroup.com/global/investors>

Table 16: Credit Risk Own Funds Requirements

	EAD	RWAs	Own funds requirements
	\$ million	\$ million	\$ million
Credit Risk (post CRM)	14,418	6,496	520

Credit Risk Measurement

Credit risk consists of five different credit risk types – direct, contingent, market-sensitive, clearing, and settlement. The types represent the category of credit facility that is used to monitor Citi's risk and are influenced by the financial accounting standards that apply to Citi's products and services. Direct, contingent, settlement and clearing risk types have a maximum potential for loss, which is 100% of the granted credit or facility amount. Market-sensitive credit risk, Potential Future Exposure ("PFE") is calculated based on an expectation of potential exposure to an obligor. This calculation is performed via models or via use of notional-based credit exposure factors.

Direct credit risk exposures primarily arise as a result of lending activities in the Citi's businesses as well as Corporate Treasury that include deposits or placements with banks.

Market-sensitive counterparty credit risk exposures primarily arise from OTC derivative contracts, repo-style transactions and margin loans. The exposure is the potential for loss should a counterparty be unable to perform its future obligations, such as to deliver a security for which a fixed price will be paid, to make a series of payments over time under a derivative contract or to maintain agreed margin to support derivative or SFT contracts.

Methodology Used to Assign Credit Risk Limits

The process for approving a counterparty's credit risk exposure limit is guided by:

- Core credit policies;
- Procedures and standards;
- Experience and judgement of credit risk professionals; and,
- The amount of exposure at risk.

Citi credit risk limits have several parameters, including a value, the type of risk and the type of product or products that the limit covers. The risk type is the same as in the institution's risk measurement model.

The credit process is grounded in a series of fundamental policies, including:

- Joint business and independent Risk Management responsibility for managing credit risks;
- A single centre of control for each credit relationship, which coordinates credit activities with each client;
- Portfolio limits to ensure diversification and to maintain risk/capital alignment;
- A minimum of two authorised credit officer signatures required on most extensions of credit, one of which must be from a credit officer in Credit Risk Management;
- Risk rating standards, applicable to every obligor and facility; and,
- Consistent standards for credit origination documentation and remedial management.

Credit risk principles, policies and procedures typically require:

- A comprehensive analysis of the proposed credit exposure or transaction;
- Review of external agency ratings (where appropriate); and,
- Financial and corporate due diligence, including support, management profile and qualitative factors.

The responsible credit officer completes a review of the financial condition of the counterparty to determine the client's business needs and compare that to the risk that Citi might be asked to extend. During consideration of a credit extension, the credit officer will assess ways to mitigate the risk through legal documentation, parental support or collateral. The process includes the determination of maximum potential exposure after recognition of netting agreements and collateral as appropriate.

While internal ratings are the starting point in establishing credit assessments, a range of factors, such as quality of management and strategy, nature of industry and regulatory environment, among others, are also taken into consideration for obligor limits and approval levels.

Once the analysis is completed and the product limits are determined, anti-tying and franchise risk is reviewed, after which the approval process takes place. The total facility amount, including direct, contingent and PFE, is aggregated and the credit officer reviews the approval grids within policy that define the appropriate level of authority needed to review and approve the facility.

As exposure to credit risk on derivatives is also impacted by market volatility, which may impair the ability of clients to satisfy their obligations to Citi, credit risk analysts conduct daily monitoring versus limits and any resulting issues are escalated to credit officers and business management as appropriate.

Internal Obligor Risk Ratings

For Citi's wholesale exposures, internal credit ratings are used in determining approval levels, risk capital and reserves. Each wholesale obligor is assigned an Obligor Risk Rating ("ORR") that reflects the one-year Probability of Default ("PD") of the obligor. Each wholesale facility is assigned a Facility Risk Rating ("FRR") that reflects the expected loss rate of the facility, the product of the one-year PD and the expected loss given default ("LGD") associated with the facility characteristics.

The ORRs are used for longer-term credit assessments for large credit relationships, which form the basis for obligor limits and approval levels. ORRs are established through an integrated framework that combines quantitative and qualitative tools, calibrated and tested across economic cycles, with risk manager expertise of customers, markets and industries. ORRs are generally expected to change in line with material changes in the PD of the obligor. Rating categories are defined consistently across wholesale credit by ranges of PDs and are used to calibrate and objectively test rating models and the final ratings assigned to individual obligors.

Risk Parameter Estimates

Independently validated models are used as part of the obligor risk rating process. These internal rating models include statistically derived models and expert judgement rating models. These models are developed primarily by an independent analytical team in conjunction with independent Risk Management. The analytical team resides in Credit, Climate and Obligor Risk Analytics, which is part of the corporate-level independent risk group. The statistical rating models cover Citi's corporate and commercial bank segments, and certain other activities, and are based on statistically significant financial variables. Expert judgement rating models cover industry or obligor segments where there are limited defaults or data histories, or highly specialised or heterogeneous populations.

To the extent that Risk Management believes the applicable model does not capture all the relevant factors affecting the credit risk of an obligor, discretionary adjustments may be applied to derive the final ORR, within limits defined by policy.

The Wholesale Credit Risk Framework requires an annual comprehensive analysis of each obligor and all proposed credit exposures to that obligor and independent Risk Management periodically reviews exposures across the trading book and banking book portfolios to ensure compliance with various limit and concentration criteria. Quarterly reviews are also conducted of certain high-risk exposures.

For UK regulatory capital purposes, CGML does not have an Internal Ratings Based model permission from the PRA.

Credit Quality of Assets

The IFRS 9 impairment standard applies to any debt instruments measured at amortised cost or at fair value through other comprehensive income and also to off-balance sheet loan commitments and financial guarantees. The standard requires an estimation of an expected credit loss ("ECL") that is unbiased and probability weighted, including information about past events, current conditions and reasonable and supportable forecasts of future events and economic conditions at the reporting date. The estimate considers the time value of money.

ECL is measured on each reporting date according to a three-stage expected credit loss impairment model, under which each financial asset is classified in one of the stages below:

- Stage 1 – From initial recognition of a financial asset to the date on which the asset has experienced a significant increase in credit risk relative to its initial recognition, a loss allowance is recognised equal to the expected credit losses resulting from defaults over the next 12 months. Interest is calculated based on the gross carrying amount of the asset; and,
- Stage 2 – Following a significant increase in credit risk relative to the risk at initial recognition of the financial asset, a loss allowance is recognised equal to the full credit losses expected over the remaining life of the asset. Interest is calculated based on the gross carrying amount of the asset.

The credit losses for financial assets in Stage 1 and Stage 2 are measured as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Group expects to receive).

- Stage 3 – When a financial asset is considered to be credit-impaired, a loss allowance equal to the full lifetime expected credit losses will be recognised. Credit losses are measured as the difference between the gross carrying amount and the present value of estimated future cash flows. Interest revenue is calculated based on the carrying amount of the asset, net of the loss allowance, rather than on its gross carrying amount.

Evidence that a financial asset is impaired includes observable data that comes to the attention of the Company such as:

- Significant financial difficulty of the issuer or obligor as measured via ORR;
- A breach of contract, such as a default;
- It becomes probable that the borrower will enter bankruptcy or other financial reorganisation; or,
- Observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the portfolio, including:
 - adverse changes in the payment status of borrowers in the portfolio; and,
 - national or local economic conditions that correlate with defaults on the assets in the portfolio.

Because of the nature of business activities and the financial assets on the Company's balance sheet (high credit quality reverse repo asset loans and short-term trade receivables), the recognition of expected credit losses has a minimal financial impact. The vast majority of CGML exposures are comprised of short-term (tenor <1 year) transactions for which 12 month and lifetime loss estimates are the same. For receivables such as trade or brokerage receivables, credit losses are recognised irrespective of changes in credit risk and for security finance transactions (reverse repos and securities borrowed) twelve-month expected credit losses are recognised.

The following tables provide a view of the performing versus non-performing nature of CGML's Credit Risk exposures.

Table 17: Credit quality of performing and non-performing exposures by past due days (UK CQ3)

\$ million		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	9,076	9,076										
010	Loans and advances	143,360	143,360										
020	Central banks	10,429	10,429										
030	General governments	62	62										
040	Credit institutions	21,379	21,379										
050	Other financial corporations	111,490	111,490										
060	Non-financial corporations												
220	Total as at 31 December 2024	152,435	152,435										

¹A financial asset is past due when a counterparty has failed to make agreed payments of principal and/or interest remain unpaid when the payment was contractually due. Exposures which are 90 days past due are treated as defaulted and classified as Stage 3 from an IFRS 9 perspective, as described above.

Table 18: Performing and non-performing exposures and related provisions (UK CR1)

\$ million		Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures		Performing exposures		Non-performing exposures				On performing exposures	On non-performing exposures
			Stage 1	Stage 2		Stage 2	Stage 3		Stage 1	Stage 2				
005	Cash balances at central banks and other demand deposits	9,076	9,076											—
010	Loans and advances	143,360	143,360											140,796
020	Central banks	10,429	10,429											11,690
030	General governments	62	62											—
040	Credit institutions	21,379	21,379											21,738
050	Other financial corporations	111,490	111,490											107,369
060	Non-financial corporations													
220	Total as at 31 December 2024	152,435	152,435											140,796

¹A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred. The same definition applies to both accounting and regulatory definitions.

Risk Concentrations

Concentration risk is the risk associated with having exposure concentrated on a specific client, industry, region or group of obligors that are sensitive to the same economic, financial or business developments. CGML Risk Management analyses risk concentrations on a monthly basis.

To manage concentration of risk within credit risk, Citi has in place a concentration management framework consisting of industry limits, obligor limits and single-name triggers. Independent Risk Management reviews concentration of risk across Citi's regions and businesses to assist in managing this type of risk.

Single-name triggers

The Total Facilities Amount ("TFA") is set by relationship group which is typically the parent company and all its subsidiaries. This aggregation is critical to ensure that credit risk can be managed holistically. Credit lines are established between one client legal entity and one Citi legal entity. The CGML Risk Management Framework, sets a level of TFA for the aggregate CGML credit lines above which higher level approval is required. This takes into account the size of CGML relative to Citigroup Inc. as a whole, but also recognises the largely collateralised nature of the business carried out on CGML. Where the aggregate amount of facilities made available to the relationship by CGML is in excess of the limits or thresholds, further approval of those aggregate facilities (not the

full relationship TFA) must be granted by a Risk Senior Credit Officer who is also a UK Material Risk Taker ("MRT").

Industry Type

In addition, a set of limits or thresholds have been put in place for CGML to monitor its exposure to industries and alert management to changes in the sectoral composition of the CGML counterparty portfolio. The industry limits are expressed as percentages of the aggregate pre-settlement exposures accounted for by different industry types, e.g. public sector entities, banks, hedge funds. The exposures to these industries are measured monthly and any exceptions are escalated to the UK Risk Management Committee.

Country

CGML's clients are located around the world and are embedded in Citi's global franchise. Exposure concentrations to clients in lower rated countries or in watch listed countries are monitored through a framework of Country Risk triggers.

Countries are segmented into three tiers, based on the Country Risk Rating and the Watchlist status. Country Risk triggers are calibrated according to tier, historic utilisation, consumption of regulatory Tier 1 Capital and business strategy considerations, and are reviewed annually.

CGML's exposure against these Country Risk triggers, as measured by the aggregate exposure to counterparties domiciled in that country, is tested on a monthly basis and any exception is escalated to the UK Risk Management Committee.

Shadow Banking Entities

The European Banking Authority ("EBA") defines Shadow Banking Entities as entities that:

- Carry out credit intermediation activities, defined as bank-like activities involving maturity transformation, liquidity transformation, leverage, credit risk transfer or similar activities; and,
- Are neither within the scope of prudential consolidation nor subject to solo prudential requirements under specified European Union ("EU") legislation (or equivalent third country legal frameworks). Entities referred to in Article 2(5) and Article 9(2) of Directive 2013/36/EU, as well as other entities as defined in the EBA Guidelines, EBA/GL/2015/20 ('excluded undertakings'), are not to be regarded as shadow banking entities.

CGML has set an internal limit on the aggregate EAD to Shadow Banking Entities at a defined proportion of eligible capital. In the event that the limit is breached, this is escalated to the UK Risk Management Committee, together with an explanation for the breach and either a plan to reduce exposure back within the limit, or a justification as to why it is appropriate to risk-accept the current exposure level.

The framework for the management of Shadow Banking exposure also requires that limits are set at the individual counterparty level.

The approach for any counterparty identified as a Shadow Banking Entity is two-fold.

- First, the counterparty will have been subject to the normal credit review and credit risk limit setting processes as set out under the Wholesale Credit Risk framework. The credit risk limits provided to the entity will have been set taking into account its characteristics, including the nature of its trading activities. These credit risk limits are set against exposures measured on the basis of the internal PFE methodology (not regulatory EAD) and are monitored daily; and,
- Second, the counterparty is assessed against a regulatory EAD threshold expressed as a percentage of eligible capital for intercompany and for third-party exposures, applicable to all the counterparties identified as Shadow Banking Entities. Any counterparty breaching this limit will be subject to a review which: (i) investigates the nature of the trades which have given rise to the exposure; (ii) further reviews the nature of the counterparty to determine how the entity will come back within the EAD limit and whether risk mitigation is required; or (iii) provides a justification as to why it is appropriate to risk-accept the exposure level. Any limit breach will be escalated to the UK Risk Management Committee and notified to the CGML Risk Committee.

The Shadow Banking counterparty limit has been set at a level which is sufficiently low to be protective to CGML's capital base, but not so low as to result in a number of entities being caught under their normal trading pattern.

Table 19: Maturity of Exposures (UK CR1-A)

The table below provide a breakdown of net exposures pre Credit Conversion Factor ("CCF") and CRM by residual maturity.

		Net exposure value				
		On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity
		\$ million	\$ million	\$ million	\$ million	\$ million
1	Loans and advances	11,983	99,318	9,876	73	22,109
2	Debt securities	—	—	—	—	—
3	Total as at 31 December 2024	11,983	99,318	9,876	73	22,109
						143,360

Credit Risk Mitigation

As part of its risk management activities, the firm uses various risk mitigants to hedge portions of the credit risk in its portfolio, in addition to outright asset sales. Credit risk mitigation, including netting, collateral and other techniques, is important to Citi in the effective management of its credit risk exposures.

The use of collateral is of critical importance in the mitigation of risk. In-house legal counsel, in consultation with approved external legal counsel, will determine whether collateral documentation is enforceable and gives the firm the right to liquidate or take possession of collateral in a timely manner in the event of the default, insolvency, bankruptcy or other defined credit event of the obligor.

Table 20: CRM techniques overview: Disclosure of the use of credit risk mitigation techniques (UK CR3)

This table shows the extent of the use of CRM techniques for CGML.

		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		\$ million	\$ million	\$ million	\$ million	\$ million
1	Loans and advances	11,639	140,796	140,796	—	—
2	Debt securities	—	—	—	—	—
3	Total	11,639	140,796	140,796	—	—
4	Of which non-performing exposures	—	—	—	—	—
5	Of which defaulted	—	—	—	—	—

Table 21: Standardised approach – Credit risk exposure and CRM effects (UK CR4)

The below table shows the effect of CCF and CRM techniques applied on total on-balance sheet and off-balance sheet credit risk exposures, across exposure classes. RWA density is expressed as total risk weighted exposures divided by exposures post CCF and post CRM.

Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWAs	RWA density (%)
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Central governments or central banks	4,762	—	4,762	—	712	15%
6 Institutions	5,172	—	5,172	—	1,180	23%
7 Corporates	1,493	—	1,493	—	1,498	100%
11 Exposures associated with particularly high risk	227	—	227	—	341	150%
15 Equity	1,555	—	1,555	—	1,556	100%
16 Other items	1,209	—	1,209	—	1,209	100%
17 Total as at 31 December 2024	14,418	—	14,418	—	6,496	45%

Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWAs	RWA density (%)
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Central governments or central banks	3,587	—	3,587	—	457	13%
6 Institutions	5,701	—	5,701	—	1,455	26%
7 Corporates	2,105	—	2,105	—	2,172	103%
11 Exposures associated with particularly high risk	3	—	3	—	5	159%
15 Equity	1,302	—	1,082	—	1,083	100%
16 Other items	1,777	—	1,777	—	1,777	100%
17 Total as at 31 December 2023	14,476	—	14,256	—	6,949	49%

Use of External Credit Ratings under the Standardised Approach for Credit Risk

Under the Standardised approach, ratings assigned by ECAs are used in the calculation of RWAs. Credit assessments applied to central governments and central banks, institutions, corporate, and equity exposure classes in the trading book and banking book alike, as determined by the PRA in accordance with the requirements of

CRD V. CGML uses ratings assigned by Standard and Poor's, Moody's and Fitch Ratings for credit risk calculations. Risk weightings are assigned to each exposure depending on its credit quality step and other factors, including exposure class and maturity.

Table 22: Risk Weightings by Credit Quality Step

Credit Quality Step	Standard & Poor's	Moody's	Fitch	Corporates	Institution (Includes Banks)			
					Governments and Central Banks	Sovereign Method	Maturity > 3 months	Maturity ≤ 3 months
1	AAA to AA-	Aaa to Aa3	AAA to AA-	20%	0%	20%	20%	20%
2	A+ to A-	A1 to A3	A+ to A-	50%	20%	50%	50%	20%
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	100%	50%	100%	50%	20%
4	BB+ to BB-	Ba1 to Ba3	BB+ to BB-	100%	100%	100%	100%	50%
5	B+ to B-	B1 to B3	B+ to B-	150%	100%	100%	100%	50%
6	CCC+ and below	Caa1 and below	CCC+ and below	150%	150%	150%	150%	150%

Table 23: Standardised approach (UK CR5)

This table provides the breakdown of CGML's credit risk exposures under the standardised approach by exposure class and risk weighting.

Exposure classes	Risk weight							Of which unrated
	0%	20%	50%	100%	150%	250%	Total	
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	
1 Central governments or central banks	4,476	—	—	—	—	285	4,762	465
6 Institutions	—	4,757	371	43	—	—	5,172	931
7 Corporates	—	—	29	1,424	40	—	1,493	1,359
11 Exposures associated with particularly high risk	—	—	—	—	227	—	227	—
15 Equity exposures	—	—	—	1,555	—	—	1,555	107
16 Other items	—	—	—	1,209	—	—	1,209	1,209
17 Total as at 31 December 2024	4,476	4,758	400	4,231	267	285	14,418	4,071

Table 23: Standardised approach (UK CR5) continued.

		Risk weight						Total	Of which unrated
		0%	20%	50%	100%	150%	250%		
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
Exposure classes									
1	Central governments or central banks	3,404	—	—	—	—	183	3,587	398
6	Institutions	—	4,737	913	51	—	—	5,701	576
7	Corporates	—	—	269	1,433	403	—	2,105	1,435
11	Exposures associated with particularly high risk	—	—	—	—	3	—	3	3
15	Equity exposures	—	—	—	1,082	—	—	1,082	132
16	Other items	—	—	—	1,777	—	—	1,777	1,777
17	Total as at 31 December 2023	3,404	4,737	1,182	4,344	406	183	14,256	4,321

Counterparty Credit Risk

Counterparty credit risk is the risk of loss resulting from the decline in credit quality (downgrade risk) or a failure of a counterparty to honour its financial or contractual obligations.

Counterparty credit risk ("CCR") is one of the most significant financial risks that Citi faces as an institution. Counterparty credit risk arises in many of CGML's businesses and as a result of activities including:

- Derivatives;
- Securities Financing Transactions ("SFTs");
- When CGML acts as an intermediary on behalf of its clients and other third parties; and,
- When acting as underwriter (not on a best-efforts basis) or within a capital raising capacity.

CGML's counterparty credit risk largely arises from its SFT and Over-the-Counter ("OTC") derivative counterparties. It will also arise from clearing and settlement exposure. As CGML's counterparty credit risk is substantially margined or secured, with the exception of short-term foreign exchange ("FX") transactions, some Commodities business or certain trades approved on a case-by-case basis, CGML only hedges a limited amount of its counterparty exposure.

CGML has an established framework for managing credit and counterparty credit risk across all businesses that includes a defined risk appetite, credit limits and credit policies, detailed earlier from page 20.

Approach to calculate capital requirements

Risk Category	Methods for Calculating Exposure	Application
Derivatives	SA-CCR	The exposure amount for a derivative contract is equal to an alpha factor of 1.4 multiplied by the sum of the replacement cost and the PFE of the netting set. The PFE portion consists of a multiplier and an aggregate add-on, which is derived from add-ons developed for each asset class. SA-CCR differentiates between margined and non-margined trades and recognises netting benefits. This method applies to all derivatives not calculated under IMM.
	IMM	IMM exposure is calculated for the derivatives specifically approved by the PRA. The exposure is calculated using the Monte Carlo simulation, with a standard supervisory alpha factor of 1.4 multiplied to the simulated Effective Expected Positive Exposure ("EEPE") value.
SFTs	Financial Collateral Comprehensive Method ("FCCM")	Under FCCM, the total exposure value is calculated as the positive difference between the exposure value of securities, commodities or cash sold, posted or lent, and the exposure value of securities, commodities or cash received in return, after applying regulatory haircuts for security volatility adjustments and any applicable currency mismatches.

Risk Measurement

For internal risk management, risk measurement is a function of three elements:

- PFE – reflects the counterparty credit exposure over a specified period of time calculated at some level of confidence;
- PD – the probability of default of a counterparty over a one year period; and,
- LGD – the ratio of the loss on an exposure due to the default of a counterparty to the amount outstanding at default.

Counterparty credit risk is calculated at least daily and at times selectively refreshed intraday to be compared to counterparty limits. When the risk is below the limit, the difference is available at the start of the next day to accept incremental business and risk. Exposure in excess of limit is reported to the credit officer for the client and to the senior credit officer in charge of the portfolio of clients to which that client belongs.

Counterparty credit exposure is measured by PFE, which is a combination of current MTM, net of margin, reflecting the net value owed to Citi by a given counterparty, and the maximum likely increase in value, calculated using Monte Carlo simulation which estimates the amount that a counterparty may owe over the life of a transaction (or a portfolio of transactions) calculated to a 95% degree of statistical confidence for modelled exposure, or via one of two fallback methods, VaR or notional-based Credit Exposure Factors.

The risk associated with these counterparty credit exposures is a function of the creditworthiness of the obligor, as well as the terms and conditions of the specific obligation. Citi assesses the risk associated with its credit exposures on a regular basis through its loan loss reserve process, as well as through regular stress testing at the company, business, geography and product levels. In addition, Citi also recognise CVA in the valuation of its OTC derivatives. These stress testing processes include estimation of potential incremental credit costs that would occur as a result of either downgrades in the credit quality or defaults of the obligors or counterparties.

The process of ensuring that all facilities are properly captured and approved is audited regularly by Banking & International Credit Review ("BICR"). BICR is an independent credit review function that assesses the effectiveness of credit risk management and the ability to identify, monitor and mitigate current and emerging credit risks across the firm. Citi uses a global risk reporting system to manage credit exposure to its wholesale obligors and counterparties.

Stress testing

CGML's stress testing infrastructure provides the ability to apply various stress scenarios to counterparty positions, portfolios and transactions. The stress results and impact of changes on counterparty risk exposure improves understanding of the risk profile of a counterparty and assists in diagnosing their vulnerabilities to specific market events.

The core CCR stress testing scenarios are the firm-wide Global Systemic Stress Testing ("GSST") scenarios augmented by CCR-specific hypothetical and historical scenarios. The Enterprise Scenario Design team within ERM is responsible for developing the GSST scenarios and for reviewing them annually to ensure that they remain appropriate in light of current and anticipated market conditions.

Ad-hoc market event scenarios are developed as required with input from Market Risk and ERM. The resulting risk factor shocks are applied in the CCR stress testing infrastructure and the impacts are analysed by the relevant functions and presented to senior management forums.

Table 24: Analysis of CCR Exposure by Approach (UK CCR1)

This table provide a comprehensive view of the methods used by CGML to calculate CCR regulatory requirements and the main parameters used within each method. This excludes CVA charges or exposures cleared through a CCP.

		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWA
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
UK1	Original Exposure Method (for derivatives)	—	—	—	1.4	—	—	—	—
UK2	Simplified SA-CCR (for derivatives)	—	—	—	1.4	—	—	—	—
1	SA-CCR (for derivatives)	4,236	15,754	—	1.4	52,327	30,011	29,122	18,613
2	IMM (for derivatives and SFTs)	—	—	17,024	1.4	72,811	23,890	23,834	15,054
2a	<i>Of which securities financing transactions netting sets</i>	—	—	—	—	—	—	—	—
2b	<i>Of which derivatives and long settlement transactions netting sets</i>	—	—	17,024	—	72,811	23,890	23,834	15,054
2c	<i>Of which from contractual cross-product netting sets</i>	—	—	—	—	—	—	—	—
3	Financial collateral simple method (for SFTs)	—	—	—	—	—	—	—	—
4	Financial collateral comprehensive method (for SFTs)	—	—	—	—	461,518	44,601	44,601	28,704
5	VaR for SFTs	—	—	—	—	—	—	—	—
6	Total as at 31 December 2024	—	—	—	—	586,656	98,502	97,557	62,372

		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWA
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
UK1	Original Exposure Method (for derivatives)	—	—	—	1.4	—	—	—	—
UK2	Simplified SA-CCR (for derivatives)	—	—	—	1.4	—	—	—	—
1	SA-CCR (for derivatives)	4,771	17,091	—	1.4	53,395	30,273	29,184	19,279
2	IMM (for derivatives and SFTs)	—	—	13,729	1.4	81,075	19,220	22,895	15,468
2a	<i>Of which securities financing transactions netting sets</i>	—	—	—	—	—	—	—	—
2b	<i>Of which derivatives and long settlement transactions netting sets</i>	—	—	13,729	—	81,075	19,220	22,895	15,468
2c	<i>Of which from contractual cross-product netting sets</i>	—	—	—	—	—	—	—	—
3	Financial collateral simple method (for SFTs)	—	—	—	—	—	—	—	—
4	Financial collateral comprehensive method (for SFTs)	—	—	—	—	603,480	54,178	54,178	33,416
5	VaR for SFTs	—	—	—	—	—	—	—	—
6	Total as at 31 December 2023	—	—	—	—	737,950	103,671	106,257	68,163

Credit Valuation Adjustments and Funding Valuation Adjustments

Credit and funding valuation adjustments ("CVA" and "FVA") respectively are applied to the relevant population of OTC derivative instruments where adjustments to reflect counterparty credit risk, own credit risk and term funding risk are required to estimate fair value. This principally includes derivatives with a base valuation (e.g. discounted using overnight indexed swap) requiring adjustment for these effects, such as uncollateralised interest rate swaps.

The CVA represents a portfolio-level adjustment to reflect the default risk premium associated with the counterparty's derivative exposure to Citi (an assets to Citi, e.g. receivables) or Citi's derivative exposure to counterparty (liabilities of Citi, e.g. payables).

The FVA represents a market funding risk premium inherent in the uncollateralised portion of a derivative portfolio and in certain collateralised derivative portfolios that do not include standard credit support annexes ("CSA"), such as where the CSA does not permit the reuse of collateral received. Citi's FVA methodology leverages the existing CVA methodology to estimate a funding exposure profile. The calculation of this exposure profile considers

collateral agreements in which the terms do not permit the Company to reuse the collateral received, including where counterparties post collateral to third-party custodians.

Citi's CVA and FVA methodologies consist of two steps:

- First, the exposure profile for each counterparty is determined using the terms of all individual derivative positions and a Monte Carlo simulation or other quantitative analysis to generate a series of expected cash flows at future points in time. The calculation of this exposure profile (often referred to as Expected Exposure, or "EE") considers the effect of credit risk mitigants and sources of funding, including pledged cash or other collateral and any legal right of offset that exists with a counterparty through arrangements such as netting agreements. Individual derivative contracts that are subject to an enforceable master netting agreement with a counterparty are aggregated as a netting set for this purpose, since it is those aggregate net cash flows that are subject to non-performance risk. This process identifies specific, point-in-time future cash flows that are subject to non-performance and term funding risk, rather than using

the current recognised net asset or liability as a basis to measure the CVA and FVA; and

- Second, for CVA, market-based views of default probabilities derived from observed credit spreads in the credit default swap ("CDS") market are applied to the expected future cash flows determined in step one. Citi's own credit CVA is determined using Citi-specific CDS spreads for the relevant tenor. Generally, counterparty CVA is initially determined using CDS spread indices for each credit rating and tenor. For certain identified netting sets where individual analysis is practicable (e.g. exposures to counterparties with liquid CDSs), counterparty specific CDS spreads are used. For FVA, a term structure of spreads is applied to the expected funding exposures (e.g. the Market Liquidity Spread used to represent the term funding premium associated with certain OTC derivatives).

The CVA and FVA are designed to incorporate a market view of the credit and funding risk, respectively, inherent in the derivative portfolio. However, most unsecured derivative instruments are negotiated bilateral contracts and are not commonly transferred to third parties. Derivative instruments are normally settled contractually or, if terminated early, are terminated at a value negotiated bilaterally between the counterparties. Thus, the CVA and FVA may not be realised upon a settlement or termination in the normal course of business. In addition, all or a portion of these adjustments may be reversed or otherwise adjusted in future periods in the event of changes in the credit or funding risk associated with the derivative instruments.

Table 25: Transactions subject to own funds requirements for CVA risk (UK CCR2)

The following table provides a view of CVA regulatory calculations with a breakdown by standardised and advanced approach.

		31 December 2024		31 December 2023	
		Exposure value	RWA	Exposure value	RWA
		\$ million	\$ million	\$ million	\$ million
1	Total transactions subject to the Advanced method	11,004	1,654	15,448	3,213
2	(i) VaR component (including the 3× multiplier)		515		1,123
3	(ii) stressed VaR component (including the 3× multiplier)		1,140		2,090
4	Transactions subject to the Standardised method	10,958	3,126	11,315	3,543
UK4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	—	—	—	—
5	Total transactions subject to own funds requirements for CVA risk	21,962	4,781	26,763	6,755

Table 26: Standardised approach – CCR exposures by regulatory exposure class and risk weights (UK CCR3)

The following table provides a breakdown on the risk-weighting of Counterparty Credit Risk exposures according to the standardised approach.

		Risk weight							
		0%	2%	4%	20%	50%	100%	150%	Others
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Central governments or central banks	6,585	—	—	2,027	607	32	—	—
2	Regional government or local authorities	194	—	—	204	—	—	—	—
3	Public sector entities	—	—	—	374	—	11	—	—
4	Multilateral development banks	—	—	—	—	—	4	—	—
5	International organisations	—	—	—	—	—	—	—	—
6	Institutions	—	23,898	8,113	8,406	33,862	1,508	—	—
7	Corporates	—	—	—	1,661	2,384	39,437	218	—
8	Retail	—	—	—	—	—	—	—	—
9	Institutions and corporates with a short-term credit assessment	—	—	—	—	—	—	—	—
10	Other items	—	—	—	—	—	—	97	—
11	Total as at 31 December 2024	6,779	23,898	8,113	12,672	36,853	40,993	315	—

		Risk weight							
		0%	2%	4%	20%	50%	100%	150%	Others
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Central governments or central banks	6,452	—	—	3,427	1,805	21	—	—
2	Regional government or local authorities	54	—	—	—	—	—	—	—
3	Public sector entities	—	—	—	664	—	3	—	—
4	Multilateral development banks	—	—	—	—	—	10	—	—
5	International organisations	—	—	—	—	—	—	—	—
6	Institutions	—	27,683	8,302	10,580	32,899	1,303	—	—
7	Corporates	—	—	—	1,479	3,276	44,451	172	—
8	Retail	—	—	—	—	—	—	—	—
9	Institutions and corporates with a short-term credit assessment	—	—	—	—	—	—	—	—
10	Other items	—	—	—	—	—	—	36	—
11	Total as at 31 December 2023	6,507	27,683	8,302	16,150	37,981	45,787	208	—

Collateral

Citi's policies and procedures cover management and governance of financial assets (including securing and valuing collateral) used for the purpose of mitigating the credit risk of OTC derivatives, repo-style transactions and eligible margin loans. Specifically, businesses are required to establish standard eligibility criteria for collateral usage and review processes for approving non-standard collateral. Industry standard legal agreements combined with internal reviews for legal enforceability are used to achieve a perfected security interest in the collateral.

Additionally, Risk Management establishes guidelines on appropriate collateral haircuts related to repo-style transactions and eligible margin loans. A haircut is the percentage of reduction in current market value applicable to each type of collateral and is largely based on liquidity and price volatility of the underlying security. Potential correlations between the exposure and the underlying collateral are reflected through the setting of appropriately greater haircuts.

Collateral Management

Collateral management refers to all systems, methods, processes, controls, data collection and Operations and Technology systems that are used to take, manage, value, maintain and realise collateral held for mitigation purposes.

The primary objectives of collateral management at Citi are:

- Risk mitigation;
- Operational efficiency in the use of collateral;
- Robust documentation on such collateral;
- A collateral structure that optimises its use;
- Efficiency and accuracy of reporting;
- Liquidity management;
- Capital allocation; and,
- Market competitiveness.

UK CRO runs a UK Entities Collateral Risk Governance Forum ("UK CRGF") to support CGML's ability to manage risks associated with collateral positions. The UK CRGF is mandated with monitoring and mitigating risks that may arise from CGML collateral positions. This includes risks associated with managing large, concentrated, volatile or illiquid collateral positions as well as positions giving rise to Wrong Way Risk ("WWR"), and ensuring there is appropriate oversight of risk associated with collateral positions.

Collateral reports are prepared monthly for SFT and OTC exposures and are reviewed at the collateral forum, focusing in particular on changes in the profile or composition of collateral or collateral concentrations.

CGML undertakes largely margined business with its counterparties. Netting is generally permitted for both SFTs and OTC derivatives. The majority of the collateral taken by CGML against OTC derivatives and SFT exposures is in the form of cash or G10 sovereign bonds.

The margin requirement for non-centrally cleared derivatives is the regulation that establishes Initial Margin ("IM") and Variation Margin ("VM") requirements for non-centrally cleared derivatives entered into after the effective date of the regulation. The rules require two-way IM posting and daily VM exchange for certain types of counterparty and for certain products defined as in scope.

Collateral considered eligible includes

- IM: cash, sovereign debt, government-sponsored debt, investment grade debt including corporate bonds, equities, gold, and shares of certain funds with appropriate haircuts; and,
- VM: cash for trades between swap dealers; same types of collateral as IM for trades between swap dealers and financial end users.

Occasionally, with appropriate agreement, other forms of collateral may be accepted.

Types of Collateral

The majority of the collateral taken by CGML against OTC derivative exposures is in the form of cash and government bonds from G7 countries. Other collateral, such as corporate bonds, municipal bonds, United States ("US") agency securities and mortgage-backed securities, may also be pledged as collateral for OTC derivative transactions.

Collateral is generally posted to secure the net open exposure of OTC derivative transactions at a netting agreement level, whereby the receiving party is free to co-mingle or re-hypothecate such collateral in the ordinary course of business. Collateral posted to open and maintain a master netting agreement with a counterparty in the form of cash and securities may from time to time be segregated in an account at a third-party custodian pursuant to a tri-party account control agreement.

In respect of SFTs, the majority of the collateral is in the form of cash, long-term and short-term debt securities; or public equity securities. Occasionally, with appropriate agreement, other forms of collateral may be accepted.

Master Netting Agreements

Credit risk from derivatives is mitigated where possible through netting agreements whereby derivative assets and liabilities with the same counterparty can be offset. Citi policy requires all netting arrangements to be legally documented. International Swaps and Derivatives Association master agreements are Citi's preferred manner for documenting OTC derivatives.

In-house legal counsel will also approve relevant jurisdictions and counterparty types for netting purposes. Off-balance sheet netting and netting of collateral against the exposure is permitted if legal counsel determine that the firm has these rights. Netting is generally permitted across SFTs, OTC derivatives and Exchange Traded Derivatives.

The agreements provide the contractual framework within which dealing activities across a full range of OTC products are conducted, and contractually bind both parties to apply close-out netting across all outstanding transactions covered by an agreement if either party defaults, or other predetermined events occur.

Citi considers the level of legal certainty regarding enforceability of its offsetting rights under master netting agreements and credit support annexes to be an important factor in its risk management process. For example, Citi generally transacts much lower volumes of derivatives under master netting agreements where Citi does not have the requisite level of legal certainty regarding enforceability.

Valuation of Collateral

Collateral valuations must be completed daily for SFTs, OTC derivatives and margin lending by the relevant operations units and collateral/margin departments. The firm has systems and procedures for requesting and promptly receiving additional collateral for transactions whose terms require maintenance of collateral values at specified thresholds as documented in the respective legal agreements.

Margining Procedures

Daily margin procedures are established for managing margin calls, which is considered best practice to maintain an appropriate level of collateral coverage reflecting market value fluctuations. Trades are reconciled on a regular basis that is consistent with regulatory and industry best practice guidelines and margin dispute processes are in place. There are control procedures in relation to collateral substitution and collateral re-use/re-hypothecation. Limits and

concentration monitoring are used to control Citi's collateral concentrations to different types of asset classes.

The firm has procedures to ensure that appropriate information is available to support the collateral process and that timely and accurate margin calls feed correctly into the margin applications from upstream systems. Key to the process is a daily credit exposure report as well as reports identifying counterparties that have not met their requirement for additional collateral to satisfy specified initial margin amounts and variation margin thresholds.

Table 27: Composition of collateral for CCR exposures (UK CCR5)

This table shows the breakdown of all types of posted or received collateral by CGML to support or reduce Counterparty Credit Risk exposures.

Collateral type	Collateral used in derivatives transactions				Collateral used in securities financing transactions (SFTs)	
	Fair value of collateral received		Fair value of collateral posted		Fair value of collateral received	Fair value of collateral posted
	Segregated	Unsegregated	Segregated	Unsegregated		
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Cash	224	50,868	1,420	50,868	239,675	285,280
2 Debt	2,431	6,428	3,073	3,537	241,195	240,686
3 Equity	1	—	2,839	53	58,084	77,251
4 Other	3,522	12,906	6,864	13,325	2,630	4,024
5 Total as at 31 December 2024	6,178	70,203	14,197	67,783	541,584	607,242

Collateral type	Collateral used in derivatives transactions				Collateral used in securities financing transactions (SFTs)	
	Fair value of collateral received		Fair value of collateral posted		Fair value of collateral received	Fair value of collateral posted
	Segregated	Unsegregated	Segregated	Unsegregated		
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Cash	410	7,153	1,628	17,914	339,915	409,535
2 Debt	5,522	16,810	10,596	17,150	381,098	368,307
3 Equity	611	164	—	—	48,630	54,282
4 Other	—	—	512	634	6,971	10,596
5 Total as at 31 December 2023	6,543	24,126	12,736	35,698	776,614	842,719

The fair value of SFT cash collateral received and posted decreased due to a reduction in cross border activity. Increased value of disclosure for Derivatives following an update to the basis of preparation for netting of derivative collateral. Comparatives have not been restated.

Wrong Way Risk

CGML is exposed to General Wrong Way Risk ("GWWR") and Specific Wrong Way Risk ("SWWR") through its business activities. Wrong Way Risk arises in counterparty credit risk transactions when there is a strong positive correlation between the counterparty's probability of default and the credit exposure, either due to a legal connection between the counterparty and the underlying exposure or collateral (SWWR) or due to general market factors (GWWR).

GWWR in financing-style transactions is identified using rules-based approaches to identify common attributes including region, country and industry between the counterparty and the underlying security or collateral. A transaction is identified as GWWR if any one of the four attributes are common between the counterparty and issuer, and categorises GWWR transactions into a high, medium and low category. The following WWR limits are applied at portfolio-level for CGML:

- SWWR notional limit for SFT;
- SWWR notional limit for OTC;
- GWWR stress loss

In addition to these portfolio-level limits, CGML uses the following for monitoring and control of WWR:

- Country WWR notional limit: SWWR or High/Medium GWWR notional exposure is aggregated at country level for SFT and TRS. Limits are set for each country rated amber or worse in the watchlist and monitored monthly. Country-

Collateral Concentrations

Cash and sovereign government bonds are the predominant form of collateral accepted in respect of margined OTC derivative transactions and SFTs as at 31 December 2024. The below table shows the breakdown of collateral posted or received by CGML to support or reduce CCR exposures, including transactions cleared through a CCP.

- level WWR notional exposure is monitored without limit for all other countries;
- Country GWWR Stress Loss Limit: The WWR stress loss measurement reflects the impact of general market factors shocks on the counterparties under a given stress scenario evaluated with both stressed and unstressed probabilities of default to determine the incremental stress loss associated with WWR. This WWR stress loss measure covers SFT and OTC derivative transactions and is subject to limit that is monitored monthly.;
- FX WWR occurs where CGML is short local currency FX Delta against hard currency at a counterparty level for counterparties whose country of risk is the country associated with the local currency. This is monitored at a client and at a country level.

For transactions identified as having SWWR, internal and regulatory exposure calculations reflect the propensity for exposure to be maximised at the point of counterparty default.

Transactions generating SWWR or GWWR which meet a specific pre-defined criteria are subject to pre-trade approval. A WWR Council meets quarterly to provide governance and oversight of CGML's WWR exposure profile.

Other forms of Credit Risk Mitigation

Citi's XVA desks use credit derivatives to manage economic CVA. CGML does not recognise the hedging benefit of eligible credit derivatives as exposure hedges for the purposes of regulatory CVA capital calculations currently.

Table 28: Credit Derivatives Exposures (UK CCR6)

The table below illustrates the extent of CGML's exposures to credit derivative transactions broken down between derivatives bought or sold.

		31 December 2024		31 December 2023	
		Protection bought	Protection sold	Protection bought	Protection sold
		\$ million	\$ million	\$ million	\$ million
Notionals					
1	Single-name credit default swaps	196,282	196,350	201,439	203,441
2	Index credit default swaps	528,017	526,397	435,523	434,211
3	Total return swaps	6,227	4,249	2,068	1,346
4	Credit options	34,707	36,935	28,823	29,633
5	Other credit derivatives	31	197	242	667
6	Total notionals	765,264	764,129	668,096	669,297
Fair values					
7	Positive fair value (asset)	1,705	17,804	1,790	16,076
8	Negative fair value (liability)	(18,096)	(1,636)	(16,184)	(1,536)

The total notional values of Credit Derivatives has increased year on year driven by an increase in market making trading volumes.

Central Counterparties

CCPs are authorised to clear several product classes, including listed and OTC financial and commodity derivatives, cash equities, bonds and other products such as repos, and play a central role in processing financial transactions and managing exposures to

diverse risks inherent in those transactions. CCPs centralise the handling of transactions and positions of counterparties, honour the obligations created by the transactions, and require adequate collateral from their members as margin and as contributions to default funds.

Table 29: Exposures to CCPs (UK CCR8)

This table provide a summary of CGML's exposures to CCPs, including types of exposures and related capital requirements.

		31 December 2024		31 December 2023	
		Exposure value	RWA	Exposure value	RWA
		\$ million	\$ million	\$ million	\$ million
1	Exposures to QCCPs (total)		1,306		2,341
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	27,632	684	46,173	1,186
3	(i) OTC derivatives	13,231	265	22,571	451
4	(ii) Exchange-traded derivatives	11,289	357	19,990	646
5	(iii) SFTs	3,113	62	3,612	89
6	(iv) Netting sets where cross-product netting has been approved	—	—	—	—
7	Segregated initial margin	1,844		3,074	
8	Non-segregated initial margin	2,536	51	23,696	474
9	Prefunded default fund contributions	1,808	571	1,636	681
10	Unfunded default fund contributions	3,466	—	3,062	—
11	Exposures to non-QCCPs (total)		54		101
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	54	54	101	101
13	(i) OTC derivatives	—	—	—	—
14	(ii) Exchange-traded derivatives	—	—	72	72
15	(iii) SFTs	54	54	29	29
16	(iv) Netting sets where cross-product netting has been approved	—	—	—	—
17	Segregated initial margin	—		—	
18	Non-segregated initial margin	—	—	—	—
19	Prefunded default fund contributions	—	—	—	—
20	Unfunded default fund contributions	—	—	—	—

Market Risk

Market risk is the risk of economic or trading loss arising from changes in the value of Citi's assets and liabilities resulting from changes in market variables, such as interest rates, equity and commodity prices, foreign exchange or credit spreads.

CGML faces market risk across both its trading and non-trading positions. The Citi Mark to Market Risk Policy articulates principles and key requirements to identify, measure, manage and report Mark-to-Market ("MTM") risk.

Market risk is managed through limits and principles laid out in CGML's Risk Appetite Statement, governed by the CGML Risk Committee and the CGML Board.

As outlined in the Citi MTM Risk Policy, Business units are responsible for complying with the Policy and for remaining within the approved independent market risk limit framework. Businesses are only permitted to take Market Risk exposure where it can be accurately and reliably measured, including at the CGML level.

Under the Citi MTM Risk Policy, any Desk or Business unit undertaking activity that is subject to MTM risk must have a Desk Mandate which describes its activities, including the mission and strategy, the types of clients, the product types and usage, trading and hedging strategies and holding periods.

In addition, any Desk or Business unit undertaking activity which gives rise to MTM Risk exposures must have one or more Permitted Product Lists defining the products and legal entities in which they are permitted to execute transactions. The Permitted Product Lists must align with the appropriate Desk Mandate.

Price risks are measured in accordance with established standards to ensure consistency across businesses and the ability to aggregate risk. Citi's market risk limit framework consists of Tier 0, Tier 1, Tier 2 and Tier 3 limits and management triggers. Tier 0 or Market Risk Concentration Limits cover the entire Market Risk Trading Risk Pool while Tier 1 Limits cover the Global Markets division activities within Market Risk Trading Risk Pool.

Table 30: Market Risk under Standardised Approach (UK MR1)

This table displays CGML's components of own funds requirements under the standardised approach for market risk.

	31 December 2024	31 December 2023
	RWAs	RWAs
	\$ million	\$ million
Outright products		
1 Interest rate risk (general and specific)	14,821	15,691
2 Equity risk (general and specific)	2,295	3,006
3 Foreign exchange risk	3,213	4,811
4 Commodity risk	893	772
Options		
7 Scenario approach	987	864
8 Securitisation (specific risk)	742	695
9 Total	22,951	25,840

Market risk RWAs under standardised approach decreased by \$2.9 billion year on year, primarily reflecting a reduction in Foreign exchange risk, along with further decrease in Equity and Interest rate risk.

Tier 2 limits are set to cover specific Product or/and Business activities within Market Risk Trading Risk Pool or in some cases at a desk, regional or legal entity level (as is the case for CGML). Tier 3 limits and management triggers are desk-level limits or triggers cover specific MTM Risk Desk activities within Market Risk Trading Risk Pool for those risk factors that have been determined material for activities by the Desk and Market Risk. CGML has a Tier 2 Limit structure (Legal Entity level), and Tier 3 (Business Level) and Tier 4 (Desk Level) Management Triggers in place.

Responsibility for hedging or otherwise mitigating market risk lies in the first instance with the business originating the risk and the management of this process begins with the employees who work most closely with CGML's customers, products and markets and extends up to the senior executives who manage these businesses with a complementary aggregation up to the country level. Risks taken must be commensurate with the risk appetite of the firm as set by senior management.

Approach to calculate capital requirements

CGML uses a combination of standardised approach and the Internal Model Approach ("IMA") to capitalise for Market Risk. Under IMA, CGML uses a VaR (Value at Risk) model to calculate market risk capital requirements in line with the IMA permission granted by the PRA. The permission covers general market risk and issuer specific risk for Fixed Income, Equities, Foreign-exchange and Commodities businesses depending on their position type and trading location. In addition to VaR based capital requirements, CGML further capitalises for Stressed VaR ("SVaR"), Incremental Risk Charge ("IRC") and Risks-Not-In-Model ("RNIM").

Non-proprietary details of the scope of CGML's IMA permission are available in the Financial Services Register on the FCA website.

Table 31: Market risk under the Internal Model Approach (UK MR2-A)

		As at 31 December 2024		As at 31 December 2023	
		RWAs	Own funds requirements	RWAs	Own funds requirements
		\$ million	\$ million	\$ million	\$ million
1	VaR (higher of values a and b)	3,308	265	3,340	267
(a)	Previous day's VaR (VaRt-1)		90		67
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		265		267
2	SVaR (higher of values a and b)	8,718	697	6,960	557
(a)	Latest available SVaR (SVaRt-1)		157		154
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		697		557
3	IRC (higher of values a and b)	5,736	459	5,916	473
(a)	Most recent IRC measure		398		473
(b)	12 weeks average IRC measure		459		401
5	Other¹	4,150	332	3,843	307
6	Total	21,912	1,753	20,059	1,605

¹Other category includes Risks Not in Model ("RNIM").

Market Risk Measurement

The independent market risk management function monitors CGML's market risk daily through a comprehensive system of limits and triggers, with monitoring reported monthly and quarterly to senior management and the CGML Board respectively.

For traded product price risk, all traded risk exposures are aggregated daily. Price risk in Citi's trading portfolios is monitored using a series of measures and covers, but not limited to, the below market factors.

Market Factor	Description
Interest rate risk (general and specific)	The valuation risk resulting from direct or indirect interest rate changes.
Equity risk (general and specific)	The valuation risk resulting directly or indirectly from stock price changes.
Foreign exchange risk	The valuation risk resulting from direct or indirect currency price changes.
Commodity risk	The valuation risk resulting from direct or indirect commodity price changes.
Credit spread risk	The valuation risk resulting from a direct or indirect change in the credit spread.

Risk factor sensitivities

CGML has factor sensitivity limits in place for a number of market risk factors that are monitored daily. Factor sensitivities measure an instrument's sensitivity to a change in value. It is the responsibility of each business to ensure that factor sensitivities are calculated and reported for all relevant risks taken within a trading portfolio.

Exposure that exceeds limit or trigger levels is escalated within Market Risk Management and to CGML's Market Risk Manager and the UK CRO, with necessary actions taken.

Citi's Standard for Pre-Trade Approval of Large, Complex and Illiquid Trades defines the identification of large, complex and illiquid trades subject to pre-trade approval, the conditions for their approval, and the framework for the periodic review of their resulting risks. The goal of the standard is to ensure that appropriate considerations are given to the impact that larger, more complex and less liquid trades may have on risk inventories and limits. The identification of illiquid products is performed by Independent Market Risk, based on liquidity and risk defeasance assessment of products' primary and secondary risk factors. For trades that fall under the 'Standard for Pre-Trade Approval of Large, Complex and Illiquid Trades', Market Risk pre-approval is required before any transaction is executed. Equity Capital Market trades

require pre-approval regardless of size. The approval framework also has a legal entity lens, requiring bespoke CGML specific approvals.

Value at Risk

Value at Risk ("VaR") is a statistical estimation of the potential decline in value of a position or a portfolio under normal market conditions, within a defined confidence level and over a specific time period.

Citi's VaR model is designed to capture potential market losses at a 99% confidence level over a one day holding period. The capital requirement is based on the VaR measure over a ten day holding period. CGML uses a one day VaR for internal risk management purposes. For one day VaR both volatility and correlation parameters are estimated from one day returns history and for ten day VaR volatility is scaled up of one day VaR volatility but correlations are still from one day returns history.

The key components of the VaR model are the variance/covariance matrix of market variables and the sensitivity of Citi's trading portfolio to those variables. The variance/covariance matrix is calibrated using three years of market data, with some volatilities adjusted up to capture fat tail effects at a 99% confidence level over a one day period, and others adjusted up to capture short-term spikes in volatility. Market variations simulated from the matrix by a Monte Carlo methodology are applied to the set of factor sensitivities to generate a forecast distribution of one day profit and loss, from which the VaR can be computed. The factor sensitivities are designed to capture all material market risks on each trading asset, both linear and non-linear in nature. Risk exposure feeds, comprising factor sensitivities, are fed from each trading unit at the end of the day and stored in internal systems. Aggregation of VaR components by market factors or portfolios is fully integrated into the model.

The risk factor covariance matrix used in the VaR calculation is updated on a monthly basis. Additionally, to reflect current market conditions, volatility of major market factors is updated on an intra-month basis through scaling factors.

Revaluation grids are used for nonlinear positions. Ten day VaR numbers are calculated directly from ten day volatility estimates. Production and reporting take place on a daily basis and for any requested sub-portfolio or market factor.

The covariance matrix used for the VaR calculation is calibrated using risk factor time series data from three years of recent history, except for commodities, where 18 months of historical data is used. A mixed approach (of relative or absolute returns, depending on the risk factor) is used in the VaR model when simulating movements in risk factors. The volatility model is a Hybrid Exponentially Weighted Moving Average approach using the maximum of the three year Fat

Tail Scaled volatility and the Exponentially Weighted Moving Average volatility estimation over an effective window of one month. In this way, both long and short (recent) historical windows are considered in this combined approach in order to achieve a prudent volatility estimation.

Stressed VaR

SVaR is a VaR-based risk measure subject to the same confidence level and holding period applicable to the VaR-based measure, but with model inputs calibrated to historical data from a continuous 12-month period that reflects a period of significant financial stress appropriate to current portfolios.

SVaR estimates the potential decline in the value of a position or a portfolio under stressed market conditions. CGML's SVaR methodology incorporates the factor sensitivities of the trading portfolio with the volatilities and correlations of those factors under stressed conditions and is expressed as the risk to the firm over a one-day holding period, at a 99% confidence level.

Citi's Monte Carlo SVaR model incorporates a full covariance matrix. The volatilities and correlations are built from thousands of market factors with actual time series from a one-year stress period for SVaR. Proxy rules exist for market factors that do not have a sufficiently long time series or where the relevant data are inappropriate for matrix construction (e.g. due to gaps, unreliable sources, or too short a history). Aggregation of SVaR components by market factors or portfolios is fully integrated into the model.

CGML bases the stress period selection on a broad set of market factors that represent all assets held by CGML. The market factor selection is based on the materiality of risk. A stress period is selected to maximise VaR for CGML's portfolio, in accordance with PRA Supervisory Statement (SS13/13).

The stressed period selection is reviewed at least quarterly by Market Risk Management, Market Risk Analytics and discussed at CGML IMA Control Committee. It is then also reported to the PRA quarterly via the CGML IMA Model Permission Quarterly Reporting Pack.

Incremental Risk Charge

Incremental Risk Charge ("IRC") is a measure of potential losses due to default and credit migration risk over a one-year time horizon at a one-tailed, 99.9% confidence level under the assumption of constant positions.

A Monte Carlo in-house 6-factor copula model is used for the correlations between issuers. The correlation depends mainly on the risk rating, region and industry sector of the issuer, and thus provides a richer correlation structure than what has been observed with 1-factor copula models.

The model is calibrated annually to the public data of over 20,000 companies maintained within Citi's databases and has been subject to ongoing independent model validation. The migration and default of each issuer are modelled consistently by a single normal random variable which is mapped to the inverse normal cumulative distribution of the transition matrix to determine whether a migration or default happens. The transition matrix is based on publicly available data from rating agencies. The scope of the issuers that is used for the calibration of the model encompasses the full spectrum of relevant trading products. The model accepts as inputs the jump-to-default amounts and the spread sensitivities from every debt issuer with Interest Rate Exposure ("IRE") in Citi's systems. Recovery rates are also simulated with their parameters properly calibrated to market data.

A fixed one-year liquidity horizon is used consistently across all positions. The approach also includes positions that have maturities of less than one year, and for such positions the time of default is determined and the Profit and Loss ("P&L") is estimated accordingly.

The IRC model is used to calculate the incremental risk capital over a one-year time horizon at a one-tailed 99.9% confidence level, which is in line with the regulatory requirements. The model has been independently validated, including testing performed on the underlying data, the modelling assumptions, and the mathematical framework.

The model parameters are calibrated on the long-term averages of through-the-cycle data that also covers the periods of significant market stress. Although back-testing is technically not feasible, given the IRC model captures default losses at a very high confidence level (99.9%), a framework for ongoing monitoring and internal governance is in place to ensure the model's performance continues to meet the required technical, regulatory and soundness standards.

Risks Not in Model

To the extent that a material risk is not adequately captured in any of the IMA models, including the VaR, SVaR models and the IRC model, CGML derives and documents Risks Not in Model ("RNIMs") as Pillar 1 add-ons to appropriately buffer the risks. The RNIM is used as a generic term to describe missing risk either from the VaR, SVaR models or from the IRC model.

RNIM capital add-ons are calculated as follows:

- VaR type RNIMs – For each relevant risk factor, the VaR based add-on ("VaR RNIM") is calculated as the standalone VaR equivalent, scaled to a ten day holding period. A stressed VaR ("SVaR RNIM") based add-on is also calculated with the stressed period identified corresponding to the one used for Stressed VaR; and,
- Stressed RNIMs – For RNIMs that are based on stress tests, CGML calibrates shocks to at least the same confidence level as would be the case where the risk to be included is in the VaR framework.
- IRC type RNIMs – Any material missing risk in IRC is also captured via Risk Not in IRC as RNIM.

RNIMs methodologies are owned by Global Market Risk Management. This includes both, the ongoing monitoring and sign-off of the existing RNIMs as well as the identification of potentially new missing risks.

Following the PRA's requirements, the calculation of the capital buffers derived from existing RNIMs are performed monthly. Existing RNIMs and any new potential RNIMs are reviewed and approved by the CGML IMA governance forums at least on a quarterly basis.

Table 32: IMA Values for Trading Portfolios (UK MR3)

This table displays the values (maximum, minimum, average and end of the reporting period) resulting from the different elements of the regulatory capital charge.

	CGML Solo		CGME Solo	
	31 December 2024	31 December 2023	31 December 2024	31 December 2023
	\$ million	\$ million	\$ million	\$ million
VaR (10 day 99%)				
Maximum value	107	163	17	19
Average value	69	90	5	9
Minimum value	46	52	2	4
Period end	111	56	111	14
SVaR (10 day 99%)				
Maximum value	527	558	60	84
Average value	177	170	16	29
Minimum value	111	88	3	10
Period end	323	103	323	51
IRC (99.9%)				
Maximum value	665	499	2	3
Average value	469	382	0	0
Minimum value	348	266	0	0
Period end	398	473	398	0

Stress Testing

Stress tests are forward-looking assessments of the potential impact of various adverse events and circumstances on Citi.

The Citi Enterprise Stress Testing Policy established the framework for evaluating the impact of the adverse and/or stress events and circumstances on Citi's operations and financial condition. CGML aligns to the Enterprise Risk Management Framework ("ERMF") with respect to stress testing capabilities, particularly in reference to single risk, multi risk, and integrated risk scenarios as well as principles and roles and responsibilities relating to stress testing.

Citi performs different stress tests at enterprise, legal entity risk pools, and business levels. Citi defines three types of stress tests including:

- Single risk: scenarios involving a single risk category such as Price Risk and Interest Rate Risk stress tests.
- Multi-risk: involving more than one Risk Pool; and
- Integrated: holistic stress scenarios applied comprehensively across the entire balance sheet, risk-weighted assets, capital, and liquidity ratios (e.g., CCAR, DFAST, ICAAP, Resolution).

The Stress Testing process for Market Risk (Trading) can be classified into two key categories:

- Global Systematic Stress Testing ("GSST"); and,
- Business Specific Stress Testing ("BSST").

Both categories of stress testing can be based on a range of historical periods of market stress or purely hypothetical future market events.

GSSTs are designed to quantify the potential impact of extreme market movements on a firm-wide basis and are performed at least weekly.

BSSTs are developed in response to Business tailored or market-specific concerns and are performed periodically. Such stress scenarios are usually idiosyncratic in nature and are designed to probe the risks of each specific portfolio, particularly risks that are not fully captured by other risk measures like VaR or GSST.

It is the joint responsibility of Market Risk Management, in consultation with the Business, to propose the parameters of the BSST, and to review them at least quarterly to ensure that they are relevant, complete, and well documented.

Back-testing

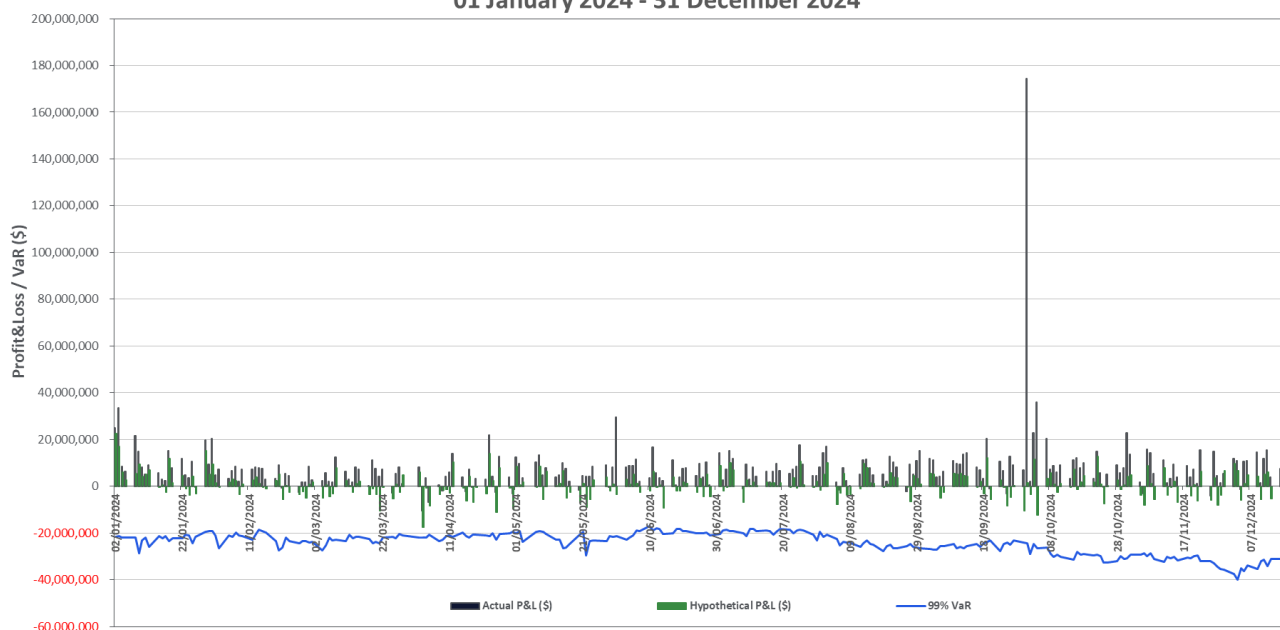
The accuracy of allocated market risk capital derived from the VaR model is assessed through daily Back-testing performed by Market Risk Reporting (actual) and Market Risk Analytics (hypothetical) with oversight from Market Risk Management. The Back-testing results for CGML's in-scope businesses, both in aggregate and at individual business level, are reported quarterly to the PRA.

Back-testing is the comparison of VaR to profit and loss results and is conducted on a daily basis, at both legal entity and business levels. In line with regulatory requirements, Citi performs Back-testing against both actual profit or loss and hypothetical profit or loss (the daily profit or loss that would arise from a constant trading portfolio) at both levels in order to ensure that the firm's VaR model meets supervisory standards for the measurement of regulatory capital. Under normal and stable market conditions, Citi would expect the number of days where trading losses exceed its VaR to be no more than two or three occasions per year. Periods of unstable market conditions could increase the number of these exceptions.

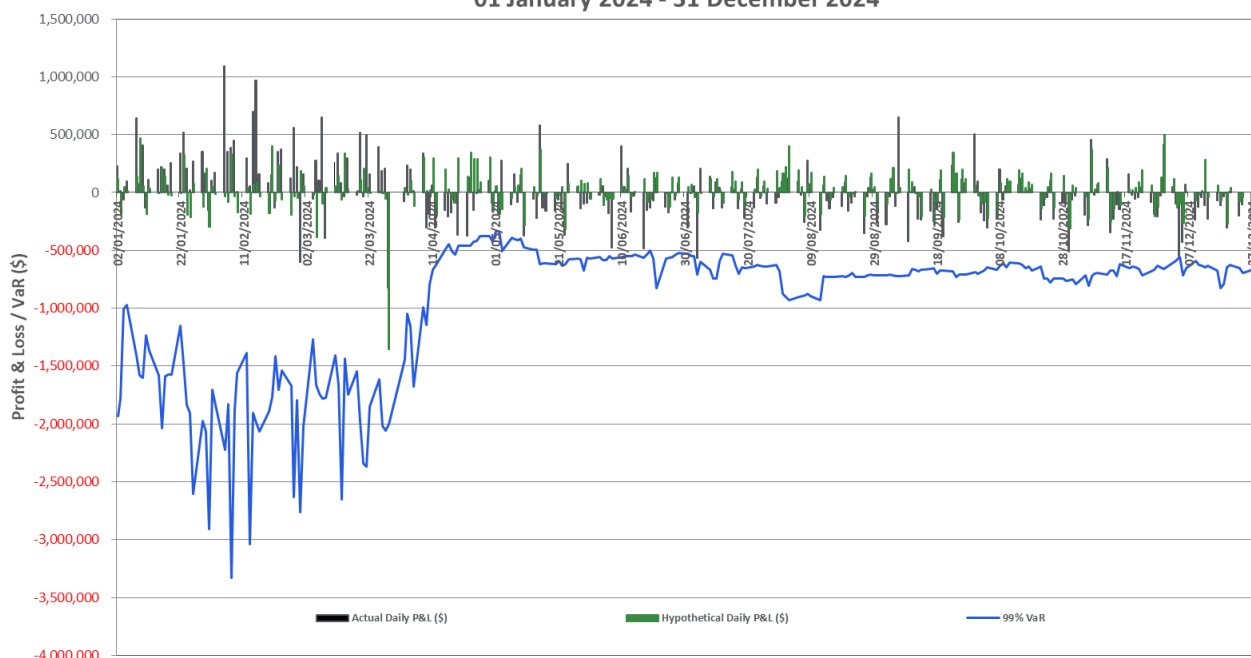
Table 33: Comparison of VaR Estimates with Gains/Losses (UK MR4)

The following charts present a comparison of the results of the approved regulatory VaR model with both hypothetical and actual trading outcomes, in order to highlight the frequency and the extent of the Back-testing exceptions and to give an analysis of the main outliers in back-tested results. The chart includes the Back-testing results of the businesses that fall within the scope of CGML's IMA model permission. There has been no exceptions for hypothetical or Actual P&L for CGML or CGME during the year.

IMA BACKTESTING - CGML Solo
01 January 2024 - 31 December 2024



IMA CGME BACKTESTING - CGME Solo
01 January 2024 - 31 December 2024



Note that the VaR in the figures is taken as the 101st worst loss out of 10,000 simulated daily P&Ls (1st percentile) from Citi's Monte Carlo VaR model. Hypothetical P&L is the P&L resulting from market moves on the opening portfolio, excluding all trading P&L, fees, commissions, financing and accruals. CGML maintains the necessary systems, controls and documentation to demonstrate appropriate standards in respect of

valuation, reporting and valuation adjustments. Total revenues of the trading business consist of:

- Customer revenue, which includes spreads from customer flow activity and gains on positions; and,
- Net interest income.

Valuation Methodology

Valuation methodologies used in CGML for trading book positions are documented and in line with the regulatory requirements set out in Article 105 of the CRR. Fair valued positions in CGML are revalued daily using market inputs whenever possible. If a market-based valuation is not possible, then positions are marked to model using input parameters sourced from the market wherever possible or sourced using appropriately prudent assumptions where not possible.

Market prices and model inputs used in the valuation process for securities and derivatives required to be measured at Fair Value are reviewed by an independent function and where required, adjustments are made to the valuations in the books and records.

Valuation adjustments ("VA's") are taken to ensure that positions represent Fair Value. These include Bid-Offer, Liquidity and Model Valuation adjustments.

It is recognised that there are a range of plausible alternative valuations that can be used for CGML's fair value inventory. Prudent Valuation additional valuation adjustments ("AVA") are required to achieve a 90% confidence that the portfolio can be exited at that valuation or better. These include, where relevant, market price uncertainty, close out cost, model risk, unearned credit spreads, investing and funding costs, concentration, future administrative costs, early termination, and operational risk AVAs.

The largest AVAs in CGML relate to equity derivatives, followed by rates derivatives, credit derivatives, commodity derivatives and fixed income securities. CGML calculates AVAs and deducts them from CET1 Capital in line with the rules supplementing Article 105 on standards for Prudential Valuation.

Table 34: Prudent Valuation Adjustments (UK PV1)

The following table provides a comprehensive view of Prudent Valuation Adjustments with a breakdown between risk categories.

Category level Additional Valuation Adjustments AVA		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification ¹	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA			
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million		\$ million	\$ million
1	Market price uncertainty	411	179	2	67	22	52	51	392	392	—
3	Close-out cost	110	106	2	48	11	—	—	139	139	—
4	Concentrated positions	12	40	2	45	—	—	—	99	99	—
5	Early termination	—	—	—	—	—	—	—	—	—	—
6	Model risk	152	11	—	18	5	9	8	101	101	—
7	Operational risk	26	15	4	6	2	—	—	53	53	—
10	Future administrative costs	54	21	—	5	—	—	—	80	80	—
12	Total adjustments as at 31 December 2024								865	865	—

Category level Additional Valuation Adjustments AVA		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification ¹	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA			
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million		\$ million	\$ million
1	Market price uncertainty	306	186	3	95	29	38	5	331	331	—
3	Close-out cost	133	114	2	80	26	—	—	178	178	—
4	Concentrated positions	—	8	—	4	2	—	—	14	14	—
5	Early termination	—	—	—	—	—	—	—	—	—	—
6	Model risk	127	12	—	24	4	8	1	89	89	—
7	Operational risk	22	17	—	9	3	—	—	51	51	—
10	Future administrative costs	65	22	1	5	—	—	—	93	93	—
12	Total adjustments as at 31 December 2023								756	756	—

¹ For "Market price uncertainty", "Close-out cost" and "Model risk" a diversification benefit of 50% is applied as permitted by CRR.

Interest Rate Risk in the Banking Book

Interest Rate Risk in the Banking Book ("IRRBB") is the risk to current or projected financial conditions and resilience, or risk to capital and earnings, arising from adverse movements in interest rates.

The Citi's Non-Trading Market Risk Policy (the "Policy") sets fourth the minimum requirements for identifying, measuring, monitoring, controlling, and reporting Non-Trading Market Risk (including IRRBB), consistent with Citi's risk appetite. The Policy establishes the framework for sound management of Citi's non-trading market risk to facilitate transparency, comparability, and aggregation of

Non-Trading Market Risk -taking activities. This policy governs the IRRBB Risk Management Framework for CGML.

Interest Rate sensitivity on CGML's Banking Book Balance Sheet is predominantly driven by secured financing transactions; namely repo, reverse repo, stock loans / borrow, margin loans, unsecured funding transactions; namely hybrid debt, subordinated debt, and senior unsecured intercompany loans. The risks arising through CGML's non-trading portfolios are estimated using a common set of standards in line with the Policy that defines, measures, limits and reports the non-trading market risk. As of December 2024, the primary risk in CGML's non-trading book is IRRBB. CGML uses a cash flow based approach for the measurement, management, and

monitoring of IRRBB metrics in line with industry best practice. Interest rate shock and stress scenarios are applied based on those prescribed by the PRA instructions (Rule 9.7 of the PRA Rulebook: CRR II Firms: Internal Capital Adequacy Assessment) and in accordance with Article 448 (1) of the CRR II disclosure requirement, as detailed in Table 34 below.

- CGML's measure of IRRBB from an earning perspective is the Interest Rate Exposure ("IRE"). IRE measures the potential pre-tax impact on Net Interest Income ("NII") for non-trading book positions due to defined shifts in interest rates over a 12-month period, as prescribed by the regulators and internally calibrated shocks. NII is the difference between the yield earned on the non-trading book assets and the rate paid on the non-trading book liabilities. A constant balance sheet is assumed under the earnings-based sensitivities. The NII sensitivity calculations are done under the following shocks: parallel up, and parallel down.
- CGML measures Economic Value Sensitivity ("EVS") for its non-trading book. EVS captures the impact of interest rate changes on CGML's Economic Value of Equity ("EVE")

and is calculated by discounting non-trading book interest rate sensitive instruments on the balance sheet using a base and stressed interest rate curve and calculating the difference in present value. A run-off balance sheet is assumed under the EVE sensitivities. The EVE sensitivities are based on the six PRA standard outlier shocks: parallel up, parallel down, steepener, flattener, short rates shock up, and short rates shock down.

CGML Board approves the IRRBB risk appetite statements. UK ALCO consistently receives updates on IRRBB metrics, trends and details on various topics impacting IRRBB. Stress testing is performed for IRRBB, where systemic stresses are designed to quantify the potential impact of extreme market movements and are constructed using both historical periods of market stress and projections of adverse economic scenarios. For internal IRRBB management, CGML uses four shocks to assess interest rate risk including: +/-100bps & +/-200bps scenarios. These are supplemented by quarterly evaluation of the prescribed Regulatory shocks detailed in the table below.

Table 35: Quantitative information in IRRBB (UK IRRBB1)

\$ million	ΔEVE		ΔNII		Tier 1 capital	
	31 December 2024	31 December 2023	31 December 2024	31 December 2023	31 December 2024	31 December 2023
010 Parallel shock up	51	226	484	490		
020 Parallel shock down	(63)	(254)	(497)	(500)		
030 Steepener shock	(4)	(5)				
040 Flattener shock	14	54				
050 Short rates shock up	33	143				
060 Short rates shock down	(38)	(150)				
070 Maximum	(63)	(254)	(497)	(500)		
080 Tier 1 capital					27,252	27,729

The decrease in EVS between December 2024 and December 2023 is primarily driven by the transition to disclosing EVS under PRA scenario (previously disclosed under EBA scenario).

Securitisation

Securitisation Activity

Whilst Citi plays a variety of roles in asset securitisation transactions, including originator, sponsor and investor, CGML's activities are only as an investor. CGML has exposure to a variety of securitisations across the trading book and non-trading book as at 31 December 2024.

Risk Management

Citi has a well-established risk management framework for the secondary trading of securitisations. The business operates under an approved permitted products list which applies at the desk level, whilst CGML has a market risk limit framework for the on-going monitoring of its securitisation positions by the relevant risk managers.

Accounting Policies for Securitisation Activity

CGML holds securitisation positions including trading of existing assets backed securities, commercial or residential mortgage-backed securities. Under IFRS, these securitisation and re-securitisation positions including synthetic and traditional are held for trading purposes and will be classified as "Financial assets at fair value through profit or loss".

Trading assets are initially recognised at fair value on settlement date and subsequently re-measured at fair value. Any changes in fair value between trade date and settlement date are reported in the income statement. Gains and losses realised on disposal or redemption and unrealised gains and losses from changes in fair value (including any foreign currency retranslation gains and losses) are reported in the income statement. Any initial gain or loss on financial instruments where valuation is dependent on valuation techniques using unobservable parameters are deferred over the life of the contract or until the instrument is redeemed, transferred or sold or the fair value becomes observable.

Regulatory Treatment for Securitisation Activity

CGML calculates RWAs on its securitisation positions using the hierarchy or approaches provided in the securitisation framework. CGML does not use the internal ratings based approach or internal assessment approach. CGML uses the SEC-SA and SEC-ERBA approaches, and under the SEC-ERBA approach CGML uses ECAI ratings assigned by Standard and Poor's, Moody's and Fitch Ratings, as detailed in Table 22 on page 24.

Securitisation positions attracting 1250% risk weight are deducted from Own Funds. The following tables provide a breakdown of CGML's securitisation exposures.

Table 36: Securitisation Exposures in the Trading Book (UK SEC2)

The following tables set out the aggregate amount of securitisation positions held in the trading book by CGML as at 31 December 2024.

	31 December 2024				31 December 2023			
	Institution acts as investor				Institution acts as investor			
	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
	STS	Non-STS			STS	Non-STS		
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Total exposures	18	275	27	321	1	445	42	487
2 Retail (total)	18	147	14	179	1	191	13	204
3 Residential mortgage	3	12	14	29	1	130	13	143
4 Credit card	16	123	0	139	—	56	—	56
5 Other retail exposures	0	11	0	11	—	4	—	4
6 Re-securitisation	0	1	0	1	—	1	—	1
7 Wholesale (total)	0	128	14	142	—	101	29	129
8 Loans to corporates	0	0	0	0	—	—	—	—
9 Commercial mortgage	0	128	14	142	—	101	29	129
10 Lease and receivables	0	0	0	0	—	—	—	—
11 Other wholesale	0	0	0	0	—	—	—	—
12 Re-securitisation	0	0	0	0	—	—	—	—
13 Other ¹	0	0	0	0	—	154	—	154

¹ Other category includes positions held in liquidity and money market funds.

Table 37: Securitisation Exposures in the Trading Book and associated Regulatory Capital Requirements - Institution acting as Investor (UK SEC4)

	Exposure values (by risk weight bands)				Exposure values (by regulatory approach)				
	≤20% RW	>20% to <50% RW	>50% to <100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA	SEC-SA	1250%/deductions
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Total as at 31 December 2024	73	11	—	208	27	—	250	44	27
2 Traditional securitisation	73	11	—	206	2	—	249	43	2
3 Securitisation	73	11	—	206	1	—	249	43	1
4 Retail underlying	19	11	—	134	—	—	136	28	—
5 Of which STS	7	11	—	—	—	—	—	18	—
6 Wholesale	55	—	—	72	1	—	113	15	1
7 Of which STS	—	—	—	—	—	—	—	—	—
8 Re-securitisation	—	—	—	—	1	—	—	—	1
9 Other ²	—	—	—	—	—	—	—	—	—
10 Synthetic securitisation	—	—	—	3	25	—	2	1	25
11 Securitisation	—	—	—	3	25	—	2	1	25
12 Retail underlying	—	—	—	3	11	—	2	1	11
13 Wholesale	—	—	—	—	14	—	—	—	14
14 Re-securitisation	—	—	—	—	—	—	—	—	—

Table 37: Securitisation Exposures in the Trading Book and associated Regulatory Capital Requirements – Institution acting as Investor continued (UK SEC4)

		Exposure values (by risk weight bands)				Exposure values (by regulatory approach)				
		≤20% RW	>20% to <50% RW	>50% to <100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA	SEC-SA	1250%/deductions
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Total as at 31 December 2023	179	27	32	209	40	—	449	27	12
2	Traditional securitisation	179	27	32	206	1	—	420	26	—
3	Securitisation	26	27	32	206	—	—	265	26	—
4	Retail underlying	25	27	32	106	—	—	165	25	—
5	Of which STS	—	—	—	—	—	—	—	—	—
6	Wholesale	1	—	—	100	—	—	100	1	—
7	Of which STS	—	—	—	—	—	—	—	—	—
8	Re-securitisation	—	—	—	—	1	—	1	—	—
9	Other ²	154	—	—	—	—	—	154	—	—
10	Synthetic securitisation	—	—	—	3	39	—	29	1	12
11	Securitisation	—	—	—	3	39	—	29	1	12
12	Retail underlying	—	—	—	3	10	—	12	1	—
13	Wholesale	—	—	—	—	29	—	17	—	12
14	Re-securitisation	—	—	—	—	—	—	—	—	—

		RWA				Capital charge after cap			
		SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹	SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Total as at 31 December 2024	—	670	72	—	—	54	6	—
2	Traditional securitisation	—	652	64	—	—	52	5	—
3	Securitisation	—	652	64	—	—	52	5	—
4	Retail underlying	—	319	62	—	—	26	5	—
5	Of which STS	—	—	4	—	—	—	—	—
6	Wholesale	—	333	2	—	—	27	—	—
7	Of which STS	—	—	—	—	—	—	—	—
8	Re-securitisation	—	—	—	—	—	—	—	—
9	Other ²	—	—	—	—	—	—	—	—
10	Synthetic securitisation	—	18	8	—	—	1	1	—
11	Securitisation	—	18	8	—	—	1	1	—
12	Retail underlying	—	18	8	—	—	1	1	—
13	Wholesale	—	—	—	—	—	—	—	—
14	Re-securitisation	—	—	—	—	—	—	—	—

		RWA				Capital charge after cap			
		SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹	SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Total as at 31 December 2023	—	707	5	—	—	55	—	—
2	Traditional securitisation	—	678	5	—	—	53	—	—
3	Securitisation	—	654	5	—	—	51	—	—
4	Retail underlying	—	265	4	—	—	21	—	—
5	Of which STS	—	—	—	—	—	—	—	—
6	Wholesale	—	389	1	—	—	30	—	—
7	Of which STS	—	—	—	—	—	—	—	—
8	Re-securitisation	—	—	—	—	—	—	—	—
9	Other ²	—	24	—	—	—	2	—	—
10	Synthetic securitisation	—	30	—	—	—	2	—	—
11	Securitisation	—	30	—	—	—	2	—	—
12	Retail underlying	—	30	—	—	—	2	—	—
13	Wholesale	—	—	—	—	—	—	—	—
14	Re-securitisation	—	—	—	—	—	—	—	—

¹ Securitisation exposures with 1250% risk weight are deducted from own funds, therefore no RWA or Capital charge applies for these positions.

² Other category includes positions held in liquidity and money market funds.

Table 38: Securitisation Exposures in the Non-trading Book (UK SEC1)

The following tables set out the aggregate amount of securitisation positions held in the banking book by CGML as at 31 December 2024.

	31 December 2024				31 December 2023			
	Institution acts as investor				Institution acts as investor			
	Traditional STS	Non-STS	Synthetic	Sub-total	Traditional STS	Non-STS	Synthetic	Sub-total
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Total exposures	—	13	—	13	—	35	—	35
2 Retail (total)	—	—	—	—	—	—	—	—
3 Residential mortgage	—	—	—	—	—	—	—	—
4 Credit card	—	—	—	—	—	—	—	—
5 Other retail exposures	—	—	—	—	—	—	—	—
6 Re-securitisation	—	—	—	—	—	—	—	—
7 Wholesale (total)	—	13	—	13	—	35	—	35
8 Loans to corporates	—	—	—	—	—	—	—	—
9 Commercial mortgage	—	13	—	13	—	35	—	35
10 Lease and receivables	—	—	—	—	—	—	—	—
11 Other wholesale	—	—	—	—	—	—	—	—
12 Re-securitisation	—	—	—	—	—	—	—	—

Table 39: Securitisation Exposures in the Non-trading Book and associated Regulatory Capital Requirements - institution acting as investor (UK SEC4)

	Exposure values (by risk weight bands)				Exposure values (by regulatory approach)				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA	SEC-SA	1250%/deductions
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Total as at 31 December 2024	—	—	—	7	6	—	7	—	6
2 Traditional securitisation	—	—	—	7	6	—	7	—	6
3 Securitisation	—	—	—	7	6	—	7	—	6
4 Retail underlying	—	—	—	—	—	—	—	—	—
5 Of which STS	—	—	—	—	—	—	—	—	—
6 Wholesale	—	—	—	7	6	—	7	—	6
7 Of which STS	—	—	—	—	—	—	—	—	—
8 Re-securitisation	—	—	—	—	—	—	—	—	—
9 Synthetic securitisation	—	—	—	—	—	—	—	—	—
10 Securitisation	—	—	—	—	—	—	—	—	—
11 Retail underlying	—	—	—	—	—	—	—	—	—
12 Wholesale	—	—	—	—	—	—	—	—	—
13 Re-securitisation	—	—	—	—	—	—	—	—	—

	Exposure values (by risk weight bands)				Exposure values (by regulatory approach)				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW	SEC-IRBA	SEC-ERBA	SEC-SA	1250%/deductions
	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1 Total as at 31 December 2023	9	—	—	25	—	—	25	10	—
2 Traditional securitisation	9	—	—	25	—	—	25	10	—
3 Securitisation	9	—	—	25	—	—	25	10	—
4 Retail underlying	—	—	—	—	—	—	—	—	—
5 Of which STS	—	—	—	—	—	—	—	—	—
6 Wholesale	9	—	—	25	—	—	25	10	—
7 Of which STS	—	—	—	—	—	—	—	—	—
8 Re-securitisation	—	—	—	—	—	—	—	—	—
9 Synthetic securitisation	—	—	—	—	—	—	—	—	—
10 Securitisation	—	—	—	—	—	—	—	—	—
11 Retail underlying	—	—	—	—	—	—	—	—	—
12 Wholesale	—	—	—	—	—	—	—	—	—
13 Re-securitisation	—	—	—	—	—	—	—	—	—

Table 39: Securitisation Exposures in the Non-trading Book and associated Regulatory Capital Requirements - Institution acting as Investor continued (UK SEC4)

		RWA				Capital charge after cap			
		SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹	SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Total as at 31 December 2024	—	57	—	—	—	5	—	—
2	Traditional securitisation	—	57	—	—	—	5	—	—
3	Securitisation	—	57	—	—	—	5	—	—
4	Retail underlying	—	—	—	—	—	—	—	—
5	Of which STS	—	—	—	—	—	—	—	—
6	Wholesale	—	57	—	—	—	5	—	—
7	Of which STS	—	—	—	—	—	—	—	—
8	Re-securitisation	—	—	—	—	—	—	—	—
9	Synthetic securitisation	—	—	—	—	—	—	—	—
10	Securitisation	—	—	—	—	—	—	—	—
11	Retail underlying	—	—	—	—	—	—	—	—
12	Wholesale	—	—	—	—	—	—	—	—
13	Re-securitisation	—	—	—	—	—	—	—	—

		RWA				Capital charge after cap			
		SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹	SEC-IRBA	SEC-ERBA and SEC-IAA	SEC-SA	1250%/deductions ¹
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
1	Total as at 31 December 2023	—	100	2	—	—	8	—	—
2	Traditional securitisation	—	100	2	—	—	8	—	—
3	Securitisation	—	100	2	—	—	8	—	—
4	Retail underlying	—	—	—	—	—	—	—	—
5	Of which STS	—	—	—	—	—	—	—	—
6	Wholesale	—	100	2	—	—	8	—	—
7	Of which STS	—	—	—	—	—	—	—	—
8	Re-securitisation	—	—	—	—	—	—	—	—
9	Synthetic securitisation	—	—	—	—	—	—	—	—
10	Securitisation	—	—	—	—	—	—	—	—
11	Retail underlying	—	—	—	—	—	—	—	—
12	Wholesale	—	—	—	—	—	—	—	—
13	Re-securitisation	—	—	—	—	—	—	—	—

¹ Securitisation exposures with 1250% risk weight are deducted from own funds, therefore no RWA or Capital charge applies for these positions.

The year on year decrease is coming from downsized exposure amount to Securitised Structured Credit and Mortgage-Backed Security ("MBS") positions.

Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. It includes legal risk, which is the risk of loss (including litigation costs, settlements and regulatory fines) resulting from the failure of the firm to comply with laws, regulations, prudent ethical standards and contractual obligations in any aspect of the firm's business but excludes strategic and reputation risks. Citi also recognises the impact of operational risk on reputation risk associated with Citi's business activities.

Operational Risk Management ("ORM"), operating within the Second Line of Defence, has the mandate to collectively enable effective and efficient Operational Risk Management practices throughout CGML, demonstrated through effective consultation and partnership with the First Line of Defence, strong oversight, and credible challenge. As a component of a strong and credible Second Line of Defence, ORM drives actions that ensure CGML stays within the agreed risk appetite on a sustained basis and make Citi a safe place to do business for our clients in line with Citi's Mission.

Operational Risk Framework

The Operational Risk Management Framework ("ORMF") establishes how Operational Risk is managed at Citi, in accordance with Citi's Enterprise Risk Management Framework. Specifically, the ORMF establishes minimum standards for consistent identification, measurement, monitoring, reporting and management of operational risk across Citi. CGML is fully aligned with Citi's Operational Risk Management Framework.

The ORMF includes various approaches that collectively (but not individually) provide complete and prioritised coverage of operational risk exposures. The Operational Risk Management Policy sets out the requirements for effective management of operational risks across Citi and establishes that Operational Risk must be managed at both granular and aggregated level enabled by the respective programs which interact with each other.

The following Operational Risk Assessment programmes provide insight into total aggregated operational risk exposures at a Citi-wide, business, or Legal Entity level:

- **Operational Risk Identification:** Material Risks, at an aggregated level for CGML, are identified in a systematic and periodic process, resulting in a listing of high-level operational risks to identify trends and focus areas.
- **Operational Risk Appetite:** Risk Appetite is the aggregate level of risk that CGML is willing to tolerate to achieve its strategic objectives. Operational Risk Appetite Statements contain qualitative principles and quantitative boundaries that are translated into risk metrics with thresholds, to enable the monitoring and controlling of CGML's Operational Risk profile relative to its risk appetite.

Granular risk exposures are specific instances of risk inherent to a process. These risks are identified, measured, monitored and/or mitigated through the following programmes:

- **Risk and Control Assessments (RCA):** Manager's Control Assessment ("MCA") is Citi's Risk & Control Self-Assessment ("RCSA") used to manage Operational and Compliance Risks at the granular level. The outcomes of a successful risk and controls assessment includes completeness and accuracy of:
 - Process, risk, control, and monitoring tool identification

- Inherent/residual risk and control assessment and monitoring
- Residual risk management
- **Loss Capture:** The Loss Capture programme supports the accurate and timely recording of internal and external loss data, which inform root cause analysis, remediation and control monitoring in MCA.
- **Issue Management:** The Issue Management programme supports accurate measurement of identified granular risk exposures, remediation of control deficiencies, enhanced processes and controls and reducing residual risk exposures to acceptable levels.
- **Lessons Learned:** The Lessons Learned Programme supports the analysis of qualifying events (internal or external which meet criteria) to minimise the likelihood of a repeat occurrence through accurate identification of root cause, appropriate remediation actions to prevent recurrence of those events and read-across to other business and functions with a similar risk exposure.
- **Scenario Analysis:** The Scenario Analysis programme provides a forward-looking assessment for low likelihood and high severity events so the organisation may quantify the potential impact and identify Management Actions to mitigate the risks.
- **New Activity:** New activities (which includes new and modified products, services, capabilities and business operating models) are subject to a robust review and approval mechanism to ensure that risks have been adequately identified and that sufficient mitigating controls are in place for the activity to proceed.

Business Continuity

Enterprise Resilience is Citi's ability to prevent, adapt and immediately respond to inevitable internal or external operational disruption. Risks to the availability of CGML's business processes and services are managed through the following programmes:

- **Continuity of Business:** Risk management at the individual process level, including but not limited to risk assessment, recovery planning, testing, and crisis management.
- **Operational Resilience:** Service-orientated assessment of Operational Resilience, evaluating the ability of Important Business Services to operate within a defined threshold (Impact Tolerance) in the event of severe but plausible disruption.

Operational Risk Governance and Reporting

The management of Operational Risk in Citi is aided via deployment of a 3 Lines of Defence model with clear accountabilities and independence of each Line.

- **First Line of Defence:** Owns and manages the risks arising from the execution of their business activities and is comprised of the First Line Units across Businesses, Functions and Geographies.
- **Second Line of Defence:** ORM, as a component of Independent Risk Management ("IRM"), provide an independent view of risk quality and quantity to management. ORM is responsible for setting requirements around operational risk management (particularly, policy, framework, and tools), and challenging Businesses' and Functions' implementation of the ORM framework as well as the quality and outcomes of their operational risk management activities.
- **Third Line of Defence:** Internal Audit is responsible for providing senior management with independent opinions on the effectiveness of the Operational Risk Management framework.

Governance for Operational Risks in CGML is provided through the UK Business Risk and Control Committee ("UK BRCC") which has been established to govern and oversee across Citi's activities in the UK and Jersey. The UK BRCC reviews, monitors, reports, challenges, and escalates these risks, as needed. UK BRCC membership includes voting members for First Line of Defence and Second Line of Defence with Third Line of Defence participation as a non-voting member.

Operational Risk reporting is produced as an output of the various risk management programmes and provides aggregated information to senior management to enable decisions regarding prioritisation and allocation of resources to mitigate operational risks. Reporting typically includes changes from previous periods, risk profile and drivers, trends, variances in operational risk losses from expected levels and management actions taken or planned in connection with mitigating operational risk exposures.

Operational Risk Measurement

CGML utilises a risk capital model for operational risk which the PRA has approved for use as an Advanced Measurement Approach ("AMA"). For the purposes of the AMA model, ORM sets requirements around the below inputs:

- Internal and External Loss data (utilising the Loss Capture programme, as described above)
- Scenario Analysis (as described above); and
- Business Environment and Internal Control Factors - the indicators of Citi's operational risk profile that reflect a current and forward-looking assessment of Citi's underlying business risk factors and internal control environment through MCA, Issues, Internal Audit reports, Key Risk Indicators to adjust the historical internal and external loss experience to current control environment.

Pursuant to the AMA model, CGML utilises units of measure which group like risks and separate heterogeneous risks for the purpose of analysis and quantification. These units of measure are defined primarily by the type of operational risk event (e.g., fraud or employment practices). For each of these units of measure,

potential loss severity and frequency are modelled independently. The potential loss severity is based on historical internal operational risk loss data, as well as historical external operational risk loss data. Citi employs a selection process with regard to historical industry operational risk loss events, which involves the identification in the relevant business(es) and operational risk management of historical industry operational risk losses that are relevant to Citi, based on the line of business(es) and operational risk exposure by event type. The mean frequency of operational risk losses is estimated from CGML's internal experience. The modelled operational risk losses across the units of measure are aggregated, considering correlation in operational risk losses across measurement units. Further, scenario analysis is conducted as a systematic process for obtaining the opinions of business managers and risk management experts, in order to derive reasoned assessments of the likelihood and loss impact of plausible, high severity operational risk losses. An AMA model change request is currently pending with the PRA to incorporate scenario analysis to the model output. At this time, scenarios are used to benchmark the model results in the form of a management overlay until the model change is approved. Model results are subsequently modified each quarter by applying a "qualitative adjustment factor" to reflect the current business and control environment.

Own funds requirements using AMA is calculated at both solo and consolidated levels for CGML and considers the data from CGML's branches and consolidating entities. For clarity, own AMA regulatory capital is not allocated to subsidiaries. CGME, as the most significant subsidiary of CGML, determines a standalone own funds requirement using the Standardised Approach ("TSA").

Operational Risk Mitigation

CGML does not include any third party insurance or other risk transfer mechanism benefits when using AMA to calculate operational risk capital.

Table 40: Operational risk own funds requirements and risk-weighted exposure amounts (UK OR1)

The table below represents the RWA's for Operational Risk by approach. The relevant indicators under TSA represent year end audited figures.

Banking activities	Relevant indicator			Own funds requirements	RWAs
	Year-3	Year-2	Last Year		
	\$ million	\$ million	\$ million	\$ million	\$ million
1 Banking activities subject to basic indicator approach (BIA)	—	—	—	—	—
2 Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	542	525	668	104	1,301
3 Subject to TSA:	542	525	668		
3a Corporate Finance	522	397	156		
3b Trading and Sales	20	128	512		
4 Subject to ASA:	—	—	—		
5 Banking activities subject to advanced measurement approaches AMA	3,499	3,627	3,829	1,973	24,663

Liquidity

Liquidity risk is the risk that CGML will not be able to efficiently meet both expected and unexpected current and future cash flow and collateral needs without adversely affecting either daily operations or its financial condition.

CGML's liquidity risk appetite is defined in entity's Risk Appetite Statement and a key element CGML's Liquidity Risk Management Framework adopts and adheres to Citigroup Inc.'s Liquidity Risk Management Policy ("LRM Policy"). Under the LRM Policy, CGML is defined as an operating MLE. As an MLE, CGML is required to maintain sufficient liquidity to meet all maturing obligations within 12 months under the Term Liquidity Stress Test. It must also meet the Resolution Liquidity Adequacy & Positioning stress metric used to measure the short-term (30 days) survival horizon under a severe market disruption stress scenario.

In addition, CGML is also required to comply with all the rules and regulations contained in relevant parts of the PRA Rulebook. Under these rules, CGML is required to maintain both the Liquidity Coverage Ratio ("LCR") and the Net Stable Funding Ratio ("NSFR") above 100% on a consolidated all-currency basis. CGML's overall liquidity adequacy is determined based on both its adherence to the internal liquidity risk appetite as well as conformance with the regulatory PRA liquidity regime.

As a result of the risks identified and assessed during the Internal Liquidity Adequacy Assessment Process ("ILAAP"), and through the application of tools, limits, policies and liquidity stress tests, the management body concludes that CGML's liquidity risk management framework is appropriate for ensuring sufficient liquidity resources are in place on a forward-looking basis. This conclusion is based on a quantitative assessment of CGML's liquidity through examination of internal stress testing results and regulatory metrics, further supported by CGML's liquidity risk management framework and governance structure. In addition, the management body considers the liquidity risk management infrastructure to be adequate to capture and measure the risks taken as a result of the entity's business profile and strategy.

Liquidity Risk Management Structure and Organisation

The UK Cluster Treasurer is responsible for the UK legal vehicles balance sheets and liquidity profile as well as those of CGML's subsidiaries. The UK Cluster Treasurer heads the UK Legal Entity Treasury group, which is responsible for managing CGML's liquidity on a day-to-day basis.

The Legal Entity Treasury team is specifically responsible for CGML's daily funding, liquidity risk management including intraday liquidity, liquidity stress testing, and for providing oversight over funds transfer pricing. The team is also responsible for managing the relationship with internal and external stakeholders. Internal stakeholders consist of Citi senior management and governance committees, the Finance desks and New York Corporate Treasury. External stakeholders comprise auditors, credit rating agencies and regulatory authorities. The London team provides oversight of the team in Budapest, to ensure adherence to the overall liquidity risk management framework.

The Legal Entity Treasury team is responsible for managing the relationship with the businesses, enhancing balance sheet management and coordination, focusing on the intersection of interest rate risk, transfer pricing, Return on Assets / Return on Tangible Common Equity, liquidity, capital allocation, and balance sheet costing.

The Liquidity Analytics team, an extension of the London Treasury team, reports into the UK Cluster Treasurer. This team is involved in review and attestation of CGML's external and internal liquidity reporting, monitoring & reviewing CGML's PRA reporting including

the LCR, PRA110 Cash Flow Mismatch, NSFR, Asset Encumbrance and Additional Liquidity Monitoring Metrics ("ALMM").

The Regulatory Liquidity Reporting team, based in Budapest, is part of the MLE Prudential Reporting team and produces regulatory liquidity returns of CGML, such as PRA reporting of LCR, NSFR, Asset Encumbrance and ALMM and PRA 110 Cash Flow Mismatch.

In order to perform a risk-based review of rules and calculation logic, and support assessment of the quality of the completeness and accuracy of the regulatory returns, an independent Quality Assurance Team is operating in Budapest. This team has skilled individuals who will undertake regular post submission testing in line with an approved plan to determine the accuracy of reporting and compliance with the regulatory requirements.

The Legal Entity Treasury team follows Citigroup's site strategy in employing a central liquidity reporting and production team in Mumbai with primary focus on the internal stress testing reports. In line with the centralised treasury model, further first line of defence coordination is provided by Global Liquidity Management team and oversight by second line of defence by Finance Risk ("FinCRO").

Strategies and Processes for Monitoring

CGML's Liquidity Risk Management Framework adopts Citigroup Inc.'s LRM Policy, which establishes the standards for defining, measuring, limiting and reporting liquidity risk.

CGML is required to prepare a plan of its liquidity position which also considers a forecast of future business activities. This is the Funding and Liquidity Plan ("FLP"), addressing strategic liquidity issues and establishes the parameters for identifying, measuring, monitoring and limiting liquidity risk and sets forth key assumptions for liquidity risk management.

A combination of metric monitoring, triggers, limits and stress testing are utilised to identify and measure liquidity risk arising from various sources. Limits and triggers are used to control risks, whilst stress assumptions are used to calibrate the level of liquidity buffer required for CGML to maintain adequate liquidity under different stress scenarios. To provide for resilience under stress, CGML holds a buffer of liquid assets, which is comprised predominantly of US, EU and UK government bonds.

CGML's liquidity position under short and long term stress scenarios is calculated in Citi's strategic liquidity risk systems and reported to senior management daily and reviewed by the UK ALCO and CGML Board through the CGML Risk Committee. CGML's Risk Committee reviews entity's ILAAP document and recommends it to CGML Board for final approval.

CGML Board also approves the Liquidity Risk Management Framework, the FLP, the Contingency Funding Plan ("CFP") and any relevant CGML-specific liquidity policies. CGML has maintained adequate liquidity resources throughout the year to meet the minimum requirements set in both internal and external (regulatory) metrics.

Contingency Funding Plan

The CFP is a key component of the Global Framework and incorporates the identification, management plan of contingent actions and escalation of a liquidity stress event. The CFP includes an overview of the Liquidity Risk Management Framework, a 'play book' for addressing liquidity and funding challenges in crisis situations, Liquidity Market Triggers or Early Warning Indicators, procedures, roles and responsibilities, communication plan and a key contact list to manage a liquidity event. The CFP defines a crisis committee that would be responsible for decision making and execution of contingent actions to address both short and longer term disruptions to funding sources.

Stress Testing

Stress testing and scenario analyses are intended to quantify the potential impact of an adverse liquidity event on the balance sheet and liquidity position, in order to maintain sufficient liquidity on hand to manage through such an event. These scenarios include assumptions about significant changes in key funding sources, market triggers (such as credit ratings), potential uses of funding and macroeconomic, geopolitical and other conditions. These conditions include expected and stressed market conditions as well as Company-specific events. Liquidity stress tests are performed to ascertain potential mismatches between liquidity sources and uses over a variety of time horizons and over different stressed conditions. To monitor the liquidity of an entity, these stress tests and potential mismatches are calculated on a daily basis.

Concentration of Funding and Liquidity Sources

In addition to stress metrics, management uses a range of quantitative metrics to measure and control liquidity risk. These include internally developed secured financing concentration metrics allowing Treasury to comprehensively manage funding risks beyond stress horizons

CGML's funding strategy is centred on maintaining a funding profile that is diversified by structure, tenor and currency. CGML closely monitors and manages the tenor of funding sources to ensure it can meet liquidity needs under different stress scenarios and different time horizons. CGML's primary funding sources include (i) repurchase agreements (ii) structured notes (iii) other short and long-term debt (including senior and subordinated debt) mainly issued by the parent, and (iv) stockholders' equity.

Management monitors concentration exposures on a daily basis and have established limits and triggers for them, some of which are classified as Category D per LRM Policy as such must be approved by the UK ALCO. The UK ALCO must review any breaches to Category D limits and triggers, including Treasury's action plan to remediate them.

Derivative Exposures and Potential Collateral Calls

In the ordinary course of business, CGML enters into various types of derivative transactions, including bilateral transactions that are OTC and transactions settled via exchanges with central counterparties. CGML enters into derivatives contracts covering interest rate, foreign currency, commodity, equity and other market/credit risks for the purpose of trading and acting as a market maker or to hedge CGML's own risk profile. Derivative contracts are highly leveraged financial products and therefore may require additional liquidity support in a stressed environment. Such requirements are typically in the form of additional margin/collateral requirements that counterparties may ask CGML to post as per the terms of the contract. The nature of additional margin/collateral requirements depend upon the nature of stress (i.e. idiosyncratic vs. market-wide). During the life span of a derivatives transaction, Citi may be required to post initial margin or variation margin. The requirement to post margin can negatively impact Citi's funding and liquidity. In addition, ratings downgrades by Rating Agencies may also have a negative impact on CGML's funding and liquidity due to reduced funding capacity and/or the need to post additional cash or securities collateral to counterparties. CGML maintains liquidity reserves to counter potential liquidity outflows from derivatives activities under various stress scenarios.

Credit Rating Downgrade

Adequate liquidity and sources of funding are essential to Citi's businesses. Funding and liquidity risks arise from multiple factors, including a loss of liquidity from derivative transactions due to legally agreed conditions such as rating downgrade triggers. Downgrade triggers can create a requirement for CGML to reserve additional liquidity in the event of rating agencies' downgrades of CGML. This can be present in both unsecured and secured derivative agreements. A typical downgrade trigger in unsecured

agreements would require CGML to post variation margin on outstanding contract payable amounts, or in secured agreements, downgrade triggers may require CGML to post additional initial margin or segregate margin received.

CGML includes the potential impact of a credit rating downgrade in its stress testing and scenario models to quantify the effect on its liquidity position. In addition to the stress test scenarios, CGML has a monitoring and reporting framework to capture potential liquidity impacts of derivative downgrade triggers. As at 31 December 2024, the potential value of additional collateral pertaining to downgrade thresholds that CGML would need to post with counterparties in the event of a one-notch rating downgrade was \$0.1 billion and a three-notch downgrade (on a cumulative basis) was \$0.2 billion.

The Degree of Centralisation of Liquidity Management and Interaction between the Group's Units

CGML is part of a multi-entity and branch organisation that operates in multiple jurisdictions. Intragroup liquidity risk arises when there are significant exposures (from lending/borrowing or similar activities) to or from group companies and one or both sides fail to meet their obligations in a stressed environment. CGML's exposure to intercompany borrowing and lending activity is controlled via internal liquidity metrics and regulatory limits. Day-to-day funding fluctuations are managed through USD unsecured intercompany loans, typically in the overnight tenor from Citicorp LLC. To the extent that CGML utilises daily resources from other Citigroup Inc. affiliates, it is assumed for stress testing purposes that these funds will not be available during a stress. As such, liquidity reserves are held against daily funding dependencies.

The UK Cluster Treasurer, reports into the banking & International Treasurer, and is responsible for the UK legal vehicles balance sheets and liquidity profile.

Liquidity Coverage Ratio

The LCR metric aims to ensure that a firm has sufficient high quality liquid assets ("HQLA") held unencumbered to cover its liquidity needs in a 30-calendar day liquidity stress scenario. For that purpose, CGML has established a HQLA framework, which also complies with the Liquidity chapter of the PRA Rulebook.

Total HQLA represents unencumbered, high-quality liquid assets held by a firm. The liquidity standards define HQLA in three asset categories: Level 1, Level 2A and Level 2B, and applies haircuts and limits to certain asset categories. As of 31 December 2024, CGML's HQLA substantially consist of Level 1 and is diversified across our major operating currencies. A portion of Level 1 assets include withdrawable central bank reserves with the Bank of England in pound sterling, for which management has established minimum requirement.

CGML's main drivers of the LCR from the 12-month average values are presented in the below sections. The most significant drivers of cash outflow amounts were secured wholesale funding, additional outflows related to derivative exposures and other contractual funding obligations. These outflows constituted majority of the LCR cash outflow amount. Secured wholesale funding transactions primarily include repurchase transactions and collateral swaps. Net derivative cash outflows are calculated with 30 calendar days scope for contractual payments and collateral that the entity will deliver to a counterparty as per the regulations. Other contractual funding obligations include primarily unsettled purchases of inventory.

Cash inflows are mainly driven by secured lending cash inflows. Secured lending transactions include reverse repurchase transactions and securities borrowed transactions. These inflows are subject to the 75% inflow cap. In addition, the PRA may require a firm to hold additional HQLA for risks not covered in the Pillar 1 LCR, referred to as Pillar 2. These are identified by CGML and documented in the ILAAP that is then reviewed and assessed by the PRA as part of the Liquidity Supervisory Review Process. The total of

HQLA reported in Table 41 below includes HQLA held to cover both Pillar 1 and Pillar 2.

Currency Mismatch in internal and regulatory stress

Cross-currency liquidity risk arises when there is a mismatch between the currency of assets and the currency of liabilities (e.g., local currency assets are funded by foreign currency liabilities). FX markets may be constrained in a crisis meaning that conversion from one currency to another cannot be guaranteed. This risk is common for international banks due to their cross-border operations and multi-currency approach to business. CGML manages its cross-currency risk through short and long-term strategies using FX swaps, multi-currency long-term funding and adjustment of the currency asset/liability mix.

Cross-currency risk is monitored via internal and regulatory stress tests calculated at individual currency level. The LCR is calculated pursuant to the PRA Rulebook in significant currencies, EUR, GBP,

USD and JPY. Resolution Liquidity Adequacy and Positioning is reported in all currencies where exposure occurs.

The majority of CGML's liquidity is held in USD, which can be readily converted to other currencies in the event of stress. To minimise liquidity mismatches, including currency mismatches, CGML seeks to fund assets in the same currency and, at the same time, monitors the potential risk from foreign currency mismatches. To the extent mismatches arise, CGML employs currency limit and monitoring indicator framework. Limits are set to restrict risk taking in currencies with high concentration by considering entity's functional currency, business model, historical activity/utilisation, PRA's expectations as well as constraints arising from Consolidated Group Level and HQLA monetization. If limits are breached, appropriate actions are taken by Treasury to reduce the mismatch. Monitoring indicators were set to provide early warning on risk taking in currencies that are not highly concentrated but pose material risk for the entity due to liquidity of the currency market and entity's access to the market. The limits and Liquidity Mismatch Index are determined by Citi's FinCRO.

Table 41: Liquidity Coverage Ratio Disclosure (UK LIQ1)

UK 1a	Quarter ending on (DD Month YYYY)	Total unweighted value (average)				Total weighted value (average)			
		31 Dec 2024	30 Sept 2024	30 Jun 2024	31 Mar 2024	31 Dec 2024	30 Sept 2024	30 Jun 2024	31 Mar 2024
UK 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
		\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					39,896	39,922	42,481	44,358
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	—	—	—	—	—	—	—	—
3	Stable deposits	—	—	—	—	—	—	—	—
4	Less stable deposits	—	—	—	—	—	—	—	—
5	Unsecured wholesale funding	2,454	2,668	2,841	3,142	2,454	2,668	2,841	3,142
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	—	—	—	—	—	—	—	—
7	Non-operational deposits (all counterparties)	1,794	1,892	2,016	2,292	1,794	1,892	2,016	2,292
8	Unsecured debt	660	776	825	850	660	776	825	850
9	Secured wholesale funding					32,287	31,200	29,986	28,267
10	Additional requirements	13,199	11,815	10,922	10,711	9,954	9,014	8,465	8,340
11	Outflows related to derivative exposures and other collateral requirements	13,195	11,811	10,912	10,682	9,950	9,010	8,455	8,311
12	Outflows related to loss of funding on debt products	—	—	—	—	—	—	—	—
13	Credit and liquidity facilities	4	4	10	29	4	4	10	29
14	Other contractual funding obligations	24,774	25,889	25,910	29,354	6,279	6,125	6,223	6,451
15	Other contingent funding obligations	1,381	1,320	1,204	1,163	690	660	602	582
16	TOTAL CASH OUTFLOWS					51,665	49,666	48,117	46,781
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	281,762	293,102	286,148	271,211	32,140	31,715	29,583	27,556
18	Inflows from fully performing exposures	1,663	1,618	1,487	1,537	1,663	1,618	1,487	1,537
19	Other cash inflows	7,198	7,453	7,402	7,228	7,198	7,453	7,402	7,228
UK-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					—	—	—	—
UK-19b	(Excess inflows from a related specialised credit institution)					—	—	—	—
20	TOTAL CASH INFLOWS	290,622	302,174	295,037	279,975	41,000	40,787	38,472	36,320
UK-20a	Fully exempt inflows	—	—	—	—	—	—	—	—
UK-20b	Inflows subject to 90% cap	—	—	—	—	—	—	—	—
UK-20c	Inflows subject to 75% cap	254,233	262,913	254,360	237,633	41,000	40,787	38,472	36,320
TOTAL ADJUSTED VALUE									
21	LIQUIDITY BUFFER					39,896	39,922	42,481	44,358
22	TOTAL NET CASH OUTFLOWS					13,675	12,417	12,352	12,225
23	LIQUIDITY COVERAGE RATIO ¹					294.4%	326.0%	347.2%	365.5%

¹ Pillar 1 LCR only

Asset Encumbrance

Asset encumbrance refers to the pledging or use of an asset as a means to secure, collateralise or credit-enhance any on-balance sheet or off-balance sheet transaction from which it cannot be freely withdrawn. The majority of our encumbrance is driven by secured financing activities, which include transactions in repo, facilitation of short positions (customer and firm), collateral swaps and derivatives trading related margin requirements. Asset encumbrance is an integral part of CGML's liquidity, funding and collateral management process.

CGML's asset encumbrance disclosure provides supervisory authorities and investors with the necessary information on the

level of asset encumbrance of the firm enabling to compare the reliance on secured funding and the degree of structural subordination of unsecured creditors and depositors across institutions. In addition, it allows regulators and investors to assess the firm's ability to handle liquidity stressed scenarios (when switching to secured sources of funding would be required). Asset encumbrance reporting is based on the UK GAAP balance sheet. CGML discloses asset encumbrance on a consolidated entity level.

CGML does not issue covered bonds or asset back securities and therefore there is no incidence of over-collateralisation on the levels of encumbrance.

Table 42: Encumbered and Unencumbered Assets (UK AE1)

	Carrying amount of encumbered assets		Fair value of encumbered assets ¹		Carrying amount of unencumbered assets		Fair value of unencumbered assets ¹	
		of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
As at 31 December 2024	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million	\$ million
010 Assets of the reporting institution³	76,980	31,343			460,394	1,496		
030 Equity instruments	22,047	6,241	—	—	4,123	—	—	—
040 Debt securities	33,407	25,102	33,407	25,102	10,385	1,496	10,385	1,496
050 of which: covered bonds	1,005	915	1,005	915	7	—	7	—
060 of which: securitisations	199	—	199	—	93	—	93	—
070 of which: issued by general governments	26,646	23,178	26,646	23,178	5,672	1,381	5,672	1,381
080 of which: issued by financial corporations	3,320	1,009	3,320	1,009	742	116	742	116
090 of which: issued by non-financial corporations	2,237	—	2,237	—	3,872	—	3,872	—
120 Other assets ^{2,4}	21,525	—			445,886	—		

¹ Fair value is the same as carrying value for Equity Instruments and Debt Securities

² The majority of unencumbered Other Assets relate to derivative instruments and cash loaned on reverse repo, while encumbered Other Assets represent cash margin posted.

³ Asset encumbrance tables are disclosed using median values. Median values shall be rolling quarterly medians over the previous twelve months and shall be determined by interpolation.

⁴ Other assets include assets not deemed available for encumbrance in the normal course of business (e.g. derivative assets, brokerage receivables payables etc.)

The firm receives securities and cash collateral in respect of securities purchased under agreement to resell, secured borrowings, margin loans and derivatives. The tables below breaks down collateral received into the portion which has been treated as encumbered and the portion which is available for encumbrance.

Table 43: Collateral received and own debt securities issued (UK AE2)

	Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
			Fair value of collateral received or own debt securities issued available for encumbrance	
	Total	of which notionally eligible EHQLA and HQLA	Total	of which EHQLA and HQLA
As at 31 December 2024	\$ million	\$ million	\$ million	\$ million
130 Collateral received by the reporting institution	381,096	321,537	64,251	32,837
140 Loans on demand	—	—	—	—
150 Equity instruments	55,094	20,954	5,047	287
160 Debt securities	326,003	300,583	42,307	32,549
170 of which: covered bonds	4,713	1,249	889	—
180 of which: asset-backed securities	4,597	—	987	—
190 of which: issued by general governments	307,371	297,564	38,286	31,631
200 of which: issued by financial corporations	5,262	1,554	454	86
210 of which: issued by non-financial corporations	5,362	—	1,772	—
220 Loans and advances other than loans on demand	—	—	—	—
230 Other collateral received	—	—	16,896	—
240 Own debt securities issued other than own covered bonds or asset-backed securities	—	—	—	—
241 Own covered bonds and asset-backed securities issued and not yet pledged	—	—	—	—
250 Total assets, collateral received and own debt securities issued	—	—	—	—

Table 44: Sources of Encumbrance (UK AE3)

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
As at 31 December 2024	\$ million	\$ million
010 Carrying amount of selected financial liabilities	433,854	235,261

Net Stable Funding Ratio

The NSFR is intended to reduce funding risk over a longer period horizon by requiring institutions to fund their assets and off-balance sheet activities with sufficiently stable sources of funding to reduce the potential for future funding stress. The ratio of

available stable funding to required stable funding is required to be greater than 100%. Numbers shown below are based on the average values of four preceding quarters.

Table 45: Net Stable Funding Ratio (UK LIQ2)

\$ million		Unweighted value by residual maturity (average)				Weighted value (average)
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding ("ASF") Items						
1	Capital items and instruments	29,031	—	—	2,293	31,324
2	Own funds	29,031	—	—	2,293	31,324
3	Other capital instruments		—	—	—	—
4	Retail deposits		—	—	—	—
5	Stable deposits		—	—	—	—
6	Less stable deposits		—	—	—	—
7	Wholesale funding:		162,293	14,711	39,232	49,442
8	Operational deposits		—	—	—	—
9	Other wholesale funding		162,293	14,711	39,232	49,442
10	Interdependent liabilities		—	—	—	—
11	Other liabilities:	—	53,285	71	1,128	1,164
12	NSFR derivative liabilities	—				
13	All other liabilities and capital instruments not included in the above categories		53,285	71	1,128	1,164
14	Total available stable funding					81,930
Required stable funding ("RSF") Items						
15	Total high-quality liquid assets (HQLA)					4,546
UK-15a	Assets encumbered for more than 12m in cover pool		—	—	—	—
	Deposits held at other financial institutions for operational purposes		—	—	—	—
17	Performing loans and securities:		196,346	9,687	34,263	46,000
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		118,088	5,404	1,477	5,798
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		74,409	1,758	6,739	14,375
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,753	675	168	1,598
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		—	—	—	—
22	Performing residential mortgages, of which:		—	—	—	—
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		—	—	—	—
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		2,096	1,850	25,879	24,229
25	Interdependent assets		—	—	—	—
26	Other assets:	—	40,137	—	11,340	18,992
27	Physical traded commodities					1,547
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		7,769	—	5,459	11,244
29	NSFR derivative assets		843	—	—	843
30	NSFR derivative liabilities before deduction of variation margin posted		25,962	—	—	1,298
31	All other assets not included in the above categories		5,563	—	4,061	4,061
32	Off-balance sheet items		—	—	—	—
33	Total RSF					69,538
34	Net Stable Funding Ratio (%)					117.9%

Other Risks

Reputation Risk

With respect to reputation risk, a Citi-wide (including a UK Cluster-based) Reputation Risk Committee composed of senior management (including the UK CRO) reviews practices involving potentially significant reputation or franchise issues. This committee reviews whether Citi's business practices have been designed and implemented in a way that meets the highest standards of professionalism, integrity and ethical behaviour.

Additional committees ensure that product risks are identified, evaluated and determined to be appropriate for Citi and its customers, and incorporate the necessary approvals, controls and accountabilities.

Strategic Risk

CGML's strategic risk management processes include the annual CGML Strategic Plan exercise, which has defined financial and operating targets which are monitored throughout the year by management and the Board to assess strategic and operating performance. CGML's strategic planning process requires CGML management to conduct a formal risk assessment of the strategic and operating plan during the strategic planning cycle.

Compliance Risk

Managing Compliance Risk is the responsibility of all employees throughout Citi, and across all three Lines of Defence. All employees need to demonstrate the appropriate level of compliance knowledge and skills commensurate with their role, and are responsible for understanding the Policies, Procedures, and Processes relevant to their business or function in order to comply with their obligations and Citi's expectations of them.

Independent Compliance Risk Management ("ICRM") is the designated Risk Category Owner for Compliance Risk, and is responsible for Second Line oversight of the Compliance Risk Categories for CGML.

CGML is fully aligned with Citi's Compliance Risk Management Framework, which supports the Enterprise Risk Management Framework ("ERMF") through its focus on the management of Compliance Risk enterprise wide and aligns with the ERMF in that it applies to Citi and all its businesses, functions, geographies, and legal entities (including CGML) that give risk to Compliance Risk exposure. The Compliance Risk Management Framework has been developed in consideration of Citi's size, complexity, and risk profile, and supports the breadth of Citi's product offerings and geographies.

The Compliance Risk Management Framework comprises the end-to-end Risk Management Lifecycle, which is comprised of activities that are used to identify, measure, monitor, control, and report risks. Compliance Risk Management Core Activities ensure that Compliance Risk management is effectively applied across all elements of the Risk Management Lifecycle.

Climate Risk

Citi continues to develop risk identification, assessment, and measurement capabilities to support our efforts with respect to climate risk management. Citi's approach to managing climate risk is detailed in the Climate Risk Management Framework ("CRMF"). The CRMF is designed to promote a globally consistent approach to managing climate risk across Citi and sets out the governance, roles, responsibilities, and principles to support the identification, measurement, monitoring, controlling, and reporting of climate risks.

CGML adopts Citi's CRMF and documents the legal entity-related governance and roles and responsibilities in the CGML Risk Management Framework. Consistent with Citi, CGML views climate risk as a cross-cutting risk which can manifest in each of the risk categories within the Citi risk taxonomy. The CRMF will evolve over time to reflect new tools and processes as well as industry standards and best practices in climate risk management.

For further information on CGML's approach to Climate Risk, please refer to the Climate Risk and Opportunities section included from page 14 in CGML's Financial Statements.

Remuneration Statement

The remuneration section of this disclosure is prepared at the CGML level and covers all jurisdictions in which CGML operates.

The remuneration policy disclosed herein applies to all business lines within all subsidiaries and branches of the Company, including those located in third countries.

Member Name	Role	Additional information
Casper von Koskull	Chair	Non-Executive Director. Chair of the CGML RemCo
Jonathan Moulds	Member	Independent Non-Executive Director.
William Fall	Member	Independent Non-Executive Director

The detailed roles and responsibilities of the CGML RemCo are set out in its Charter as delegated and approved by the Board.

The CGML RemCo has responsibility for the oversight of the design and implementation of the Company's Remuneration Policy ("Remuneration Policy") to ensure that the remuneration practices do not promote excessive risk taking, evaluate compliance with this policy and assess whether these remuneration practices are creating the desired incentives for managing risk, capital and liquidity, and that the remuneration policy is gender neutral.

The CGML RemCo has delegated responsibility from the Board for the review and, where appropriate, approval of proposed decisions regarding remuneration of employees and in particular MRTs. When reviewing such decisions, the CGML RemCo shall take into account relevant guidance on the long-term interest of shareholders, investors and other stakeholders in the Company and the public interest.

When reviewing the key principles in the Remuneration Policy, the CGML RemCo shall give consideration to compliance by the Company with its regulatory obligations, including those under the Capital Requirements Directive 2013/36/EU ("CRD V"), the European Banking Authority Guidelines on Sound Remuneration Policies ("EBA Guidelines"), national regulations, the Remuneration Part of the PRA Rulebook, and the FCA SYSC 19D Remuneration Code.

The CGML RemCo operates with on-going support and guidance from multiple stakeholders including Human Resources, Finance, Risk Management, Independent Compliance Risk Management ("ICRM"), Legal and Internal Audit who all perform necessary roles in various aspects of remuneration processes and policy. This includes identifying, collating and measuring conduct and risk information for inclusion in the performance and accountability processes.

The CGML RemCo also includes cross-committee membership with the Risk Committee and the Audit Committee.

The CGML RemCo is empowered to draw upon internal and external expertise and advice as it determines appropriate. It has the ability to review the appointment of external remuneration consultants that the Board and/or the CGML RemCo may decide to engage for advice or support. The CGML RemCo did not engage independent consultants in 2024, but external consultants have advised on various remuneration matters for 2024, where required.

Global Remuneration Committee

The CGML RemCo acts as the remuneration committee of the Company, whereas the Compensation, Performance Management and Culture Committee ("CPC Committee") fulfils the RemCo role at the Group level, with additional responsibility for culture, ethics and performance management.

Remuneration Governance

CGML Remuneration Committee ("CGML RemCo")

The CGML RemCo is a standing committee of the CGML Board, from which it derives its authority. The CGML RemCo met 9 times in 2024 and for the 2024 performance year the CGML RemCo comprised the following members:

The CPC Committee is a duly constituted committee of the Board of Directors of Citigroup Inc. ("Citi" or the "firm") which oversees Citi's global remuneration policies and practices.

The CPC Committee's terms of reference are documented in the CPC Committee Charter, which establishes the scope and mandate of the CPC Committee's responsibilities and the general principles governing Citi remuneration policy globally. The latest Charter is available online at: <https://www.citigroup.com/rcs/citigpa/storage/public/compensation-performance-management-culture-committee-charter-february-13-2025.pdf>

The CPC Committee members are all Independent Non-Executive Directors of Citi who are selected and appointed based on their background in business generally, and in remuneration, corporate governance and/or regulatory matters specifically. They are also chosen for their capability to fulfil their responsibilities as CPC Committee members. The CPC Committee includes cross-membership with the Citi Board of Directors' Risk Management Committee, the Audit Committee, the Executive Committee, the Technology Committee as well as the Nomination, Governance & Public Affairs Committee. The CPC Committee draws on the considerable experience of the Non-Executive Directors of the Board of Citigroup Inc. and is empowered to draw upon internal and external expertise and advice as it determines appropriate.

The CPC Committee annually reviews the compensation structures for senior executives of Citi and a number of highly compensated and/or regulated individuals, in accordance with guidelines established by the CPC Committee and provides oversight of the design and structure of incentive programs globally in the context of risk management.

Material Risk Takers

CGML annually identifies its MRTs and maintains a record of those identified. This process captures the categories of individuals whose professional activities are determined as having a material impact on the Company's risk profile.

CGML identifies MRTs principally using its understanding of the criteria for identification as set out in CRD V, the Commission Delegated Regulation (EU) No 2021/923 and the EBA Regulatory Technical Standards for MRT identification. Appropriate judgement will be exercised when considering who should be captured as an MRT.

Those captured include, but are not limited to:

- Members of the Management Body or Senior Management;
- Those with managerial responsibility over Control Functions or Material Business Units and certain direct / matrix reports;
- Individuals in receipt of significant remuneration in the preceding financial year; and,

- Staff members or categories of staff having an impact on an institution's risk profile that is comparably as material as that of the staff members referred to above.

When applying quantitative criteria based on staff members' remuneration, the fixed and variable remuneration awarded for the preceding financial year is taken into account.

Citi's Compensation Philosophy

Employee compensation is a critical tool for Citi to attract and retain top talent and successfully execute our corporate goals. Citi's compensation programs are designed to appropriately balance the incentives offered to employees who take risks to achieve financial and competitive performance objectives and the need to prudently manage those risks along with other imperatives.

The Citi Compensation Philosophy was developed and approved by the CPC Committee in consultation with management, independent consultants and Citi's senior risk officers, HR and the relevant functions.

The Company's Compensation Philosophy is consistent with Citi's Compensation Philosophy which is available online at: <https://www.citigroup.com/rcs/citigpa/storage/public/comp-phil-policy.pdf>

Citi's (and therefore the Company's) Compensation Philosophy is closely linked to the ongoing work on embedding appropriate culture, including through the Citi Mission and Value Proposition and the Citi Leadership Principles. The Compensation Philosophy sets out Citi's commitment to properly balance risk-taking and risk-mitigating incentives, and the oversight from the CPC Committee on the design and operation of Citi's compensation programs. Citi's Compensation Philosophy applies to all of its foreign subsidiaries and branches, save where exceptions are required by local law.

The Compensation Philosophy describes Citi's approach to balancing six primary objectives that Citi's compensation programs are designed to achieve. These compensation objectives, as outlined below, have been developed and approved by the CPC Committee. Citi's Principal Compensation Objectives are:

- Incentivise conduct that aligns with shareholder and other stakeholder interest,
- Reinforce a business culture based on accountability, achieving excellence and maintaining the highest ethical and control standards through Citi's Leadership Principles,
- Encourage prudent individual and group decision-making in regard to risk consistent with applicable regulatory guidance and Citi's Mission and Value Proposition Statement, and
- Function as a tool to attract and retain the best talent and to reward talent for engaging in appropriate behaviours that support Citi's corporate goals,
- Encourage behaviours that are in the best interest of our customers, shareholders and the goals of the organization, and
- Align realised pay with achievement of important risk and control, regulatory, strategic and financial-based objectives.

Citi's Mission, Value Proposition and Leadership Principles

Citi's Mission, Value Proposition and Leadership Principles are reflective of Citi's business strategy and objectives, and feed into Citi's reward programs and performance assessment approach. Citi's Mission and Value Proposition states that Citi serves as a trusted partner to its clients by responsibly providing financial services that enable growth and economic progress, and that everything undertaken by its employees:

- Is in clients' interests;
- Creates economic value; and,
- Is always systemically responsible.

Citi incorporates the reinforcement of positive behaviours in line with the Mission and Value Proposition into Global employee reward programs.

Markets in Financial Instruments Directive

In line with the requirements of MiFID II Delegated Regulation of 25 April 2016, SYSC 19 and FCA 2022/31 - Consumer Duty Instrument 2022, Citi considers and seeks to ensure that its remuneration practices, performance assessment of its staff and resulting remuneration is consistent with its duty to treat clients fairly.

Design and Structure of Remuneration

Citi aims to implement a broadly consistent global philosophy and framework in relation to its remuneration policies and practices. Remuneration Policy is non-discriminatory and gender neutral, and Citi seeks to operate all remuneration policies and practices in a non-discriminatory way.

The Remuneration Policy is subject to review at least annually, as Citi refines its remuneration programs at global, regional and entity levels or as required by law or regulation. In 2024, the Remuneration Policy was reviewed from the perspective of alignment to regulatory requirements, Citi's Compensation Philosophy and market practices.

The Remuneration Policy is also subject to annual control function review which focuses on the design and operation of Citi's policies, processes, controls and compliance with regulatory requirements.

Fixed Remuneration

Fixed remuneration is set appropriately to attract, retain and motivate employees in line with market practices. Fixed remuneration primarily reflects an employee's professional experience and organisational responsibilities as set out in the employee's job description and terms of employment, and includes the following elements:

- Salary;
- Pension and benefits that are offered to employees as part of their overall reward package;
- Role Based Allowances ("RBAs").

In line with regulatory requirements, RBAs are granted to a limited number of roles. The rationale for granting an RBA is clearly articulated by reference to the eligibility criteria, including details on the responsibilities and scope of the role. RBAs are subject to additional approvals.

All of these elements are classified as fixed remuneration on the basis of the EBA Guidelines (including that they do not depend on performance).

Variable Remuneration

Citi operates a flexible remuneration policy, in which variable remuneration is discretionary, subject to individual, business and firm performance, and can be reduced to zero where permitted by law.

Citi's Discretionary Incentive and Retention Award Plan ("DIRAP") is the scheme under which employees globally are awarded annual bonuses. It is designed to incentivise, reward and retain employees based on their performance and contribution. All MRTs are eligible to participate in the DIRAP, with the exception of external Independent Non-Executive Directors and Non-Executive Directors who were not employed by Citi in any other capacity.

The Transformation Program Award ("TPA") was introduced for senior leaders whose roles were identified as critical to the remediation program linked to the long-term success of Citi's transformation. The scheme focused on driving excellence in its risk

and control environment, its operations and Citi's service to clients. The TPA concluded in December 2024.

Performance Share Unit Awards ("PSU") forms part of Citi's incentive compensation for members of the Executive Management Team ("EMT"). From the 2023 performance year this was extended to include EMT members and other selected senior employees who are UK MRTs, and for the 2024 performance year was further extended to include Citi Operating Team members based in the UK.

The scheme is intended to align compensation to shareholder interest for senior members of the firm. Performance metrics include weighted average Return on Tangible Common Equity and cumulative Tangible Book Value Per Share over a three-year performance period. Details are available in the Citigroup Inc. Proxy Statement.

Deferrals and Retention Periods

At Citi, variable remuneration is typically awarded in cash and Citi shares ("Citi equity") and is subject to mandatory deferral periods where the individual's total annual variable compensation exceeds globally set thresholds. Citi believes that awarding equity and deferred awards is an effective means of aligning employee interests with those of shareholders and other stakeholders.

For MRTs, who do not meet the de-minimis threshold under CRD V, at least 50% of the upfront and deferred components of variable remuneration are delivered in Citi equity. Variable remuneration of those MRTs is subject to deferral rates of between 40% and 80% of total variable remuneration, with a minimum 60% deferral being employed when total variable remuneration is a particularly high amount in line with regulatory requirements.

Deferred awards to MRTs, who do not meet the de-minimis threshold under CRD V, vest over at least four years, depending on the MRT category as outlined below. Those awards are subject to a further retention period post-vesting.

MRT Category	Deferral Period	Retention Period
Standard MRT	4 years	12 months
Risk Manager MRT ¹	5 years	6 months*
MRTs identified as FCA designated Senior Managers	5 years	6 months*
MRTs identified as PRA designated Senior Managers	7 years	6 months*

¹Risk-Manager MRTs are identified by the PRA by reference to particular qualitative criteria in Commission Delegated Regulation (EU) No 2021/923.

*Awards to MRTs who are members of the management body and/or senior management are subject to retention for 12 months

Deferral periods for non-higher paid Risk Manager MRTs and PRA Senior Managers are reduced to 4 years and 5 years respectively, provided they are not members of the management body or senior management.

All immediate Citi equity awards for MRTs, who do not meet the de-minimis threshold under CRD V, are subject to a further twelve-month retention period post-vesting.

Variable remuneration is not paid through vehicles or methods that might facilitate non-compliance with relevant regulatory requirements, including CRD V or CRR II.

Citi does not pay dividends on deferred equity or interest on deferred cash to MRTs.

Ratio of Variable to Fixed Remuneration

Citi seeks to balance the components of reward between fixed and variable, and short and long-term components. An annual review of the balance between fixed and variable remuneration takes place and, where required, adjustments are made to the fixed element of

pay to ensure that an appropriate balance continues to be maintained on an on-going basis.

With effect from the 2024 performance year, Citi has set the maximum fixed to variable ratio at 1:6 (or 1:4 for individuals in Control Function roles). The maximum 1:2 ratio continues to apply to employees of UK branches of Citi entities that are based in the EU and are subject to the EBA bonus cap rules.

De-minimis

In line with point b of Article 94(3) of CRD V, the Company avails itself of the opportunity of derogation from the requirements set out in Article 94(1) (l) and (m) and in the second paragraph (o) for MRTs whose annual variable remuneration does not exceed GBP 44,000 and does not represent more than one third of their total annual remuneration.

For 2024 performance year 13 MRTs benefited from this derogation with their remuneration totalling \$4.12 million in fixed and \$0.42 million variable.

MRTs who fall within *de-minimis* thresholds, may still be subject to deferrals under other applicable regulations or under Citi's standard mandatory deferral structure.

Performance and Malus Adjustments

Material Adverse Outcome

Deferred awards have ex-post adjustment mechanisms that may result in the cancellation of all or part of unpaid amounts. These conditions ensure an appropriate balance for risk and aligns the actual pay-out to employees with business performance.

The full deferral can be cancelled if it is determined that the participant has had significant responsibility for a Material Adverse Outcome ("MAO") or Violation of any Material Risk Limits. A MAO means any Incident that results in Material Harm to Citi. A Material Risk Limits means that the participant violated any material risk limit established or revised by senior management and/or risk management. Significant responsibility means that the participant engaged in conduct, or was responsible for conduct, which resulted in an incident which was determined to be a MAO or is accountable for the event under the Global Disciplinary Review Policy.

A portion of the deferred equity award will be cancelled if it is determined that the participant has had a significant responsibility for a significant loss to Citi.

Malus and Clawback

All deferred remuneration awarded to MRTs is also subject to adjustment and clawback for misconduct.

Clawback is possible for up to seven years from the date of the award for impacted MRTs, or potentially up to ten years for UK-designated Senior Managers.

If the Company determines that it is appropriate to recover some or all of the amount that was paid pursuant to an award, then it may offset and/or make deductions from an individual's salary or from any other sums due to them from the Company or any associated company.

Malus and Clawback provisions can apply in circumstances envisaged in regulations such as when there is reasonable evidence that an MRT was responsible for, or participated in, misconduct that resulted in significant losses in connection with their employment, or conduct that resulted in Citi or their business unit suffering a material failure of risk management, or if the MRT failed to meet appropriate standards of fitness and propriety.

Link between Pay and Performance

Remuneration is determined by a combination of factors which include firm, business and individual performance / contribution. Individual performance ratings reflect both 'what' outcomes have been achieved and 'how' they were achieved. Performance ratings then guide bonus decision-making.

Capital and Liquidity Planning

To ensure that awards, pay out and vesting of variable remuneration is not detrimental to maintaining a sound capital base, the financial soundness and liquidity of the Company is considered in advance of the year end remuneration cycle.

Determination of Bonus Pools

Bonus pools are determined at a global level. The process for determining incentive compensation pools includes the consideration of risk-balanced performance metrics, thereby limiting incentives for employees to take imprudent risks.

Citi's incentive compensation program is a discretionary program. The level of any bonus pool is based on various quantitative and qualitative factors and discretionary considerations, including:

- Year over year business performance;
- Performance compared with plan for the current year;
- Performance against key risks (including conduct risk, operational risk, etc.) and control objectives;
- Compensation pay-out ratios and amounts accrued for incentives;
- Performance relative to peers;
- Market compensation relative to peers;
- Events that occurred during the year; this includes positive and negative events;
- Specific goals or objectives noted in the executive scorecards;
- Stakeholder feedback;
- Socio-political environment;
- Headcount and other indicative data changes; and
- Other risk-based adjustment and/or investment relative to market position, regulatory obligations, control, or the economic environment.

Allocations of pools among individual employees also take into account risk, based on performance ratings in the Risk and Control Pillar of our performance management framework. The Risk & Control Pillar measures employees on a 4-point scale for performance against their Risk & Control goals. When making a compensation decision, managers are expected to account for risk and control performance and incentivizing good behaviours and are provided guidance to this effect.

Individual Performance

Citi's various performance and accountability processes align Citi's remuneration practices with overall strategy, objectives, values and long-term interests. They reinforce achievement of goals and expected behaviour to ensure appropriate accountability, performance and compensation outcomes.

One of Citi's compensation principles is to "compensate employees based on the achievement of goals, embodiment of Citi's Leadership Principles, and risk-adjusted performance demonstrated over time, balanced with appropriate recognition for short-term results and contributions".

The Performance Management Framework is applicable to all Citi employees globally and the structure leverages four overarching pillars (Leadership, Risk & Control, Financial Performance¹, and Client & Franchise Outcomes) against which all employees set their performance goals for the performance year.

The Performance Management Framework is designed to hold all employees accountable for their risk and controls performance and behaviour by establishing a Risk & Control pillar across the organisation. The Leadership pillar aligns an employee's individual performance with Citi's culture via Citi Leadership Principles and strategic objective.

Employee performance is evaluated on a four-point scale at year end by a manager assessment. Evaluation ratings generated through this Performance Management Framework will be used for employee compensation determinations.

Pillar ratings are converted to two performance ratings: a "How" rating (composed solely by the Leadership performance pillar evaluation) and a "What" rating (auto-calculated based on the combined ratings of the applicable sub-pillars). The two performance ratings ("How", "What") carry equal weight, however there is no overall combined rating.

Citi Leadership Principles, against which employee performance is assessed, represent the qualities, behaviours and expectations that Citi employees must exhibit to deliver on Citi's mission of enabling growth and economic progress, and they will contribute to creating a culture that drives client excellence, controls excellence and operational excellence. The Leadership Principles are below:

Leadership Principles

We Take Ownership	We challenge one another to a higher standard in everything we do.
	• Greets change with optimism, curiosity and resilience. • Speaks up with candour and welcomes challenge from others. • Learns from experiences, adapts and improves. • Prioritises the greater good when contributing to honouring group decisions.
We Deliver with Pride	We strive for client excellence, controls excellence and operational excellence.
	• Simplifies, standardises and clarifies work. • Holds self and others accountable for managing risk with appropriate controls. • Creates long-term value by fixing root causes. • Takes pride in always doing the right thing.
We Succeed Together	We value and learn from difference perspectives to surpass stakeholder expectations.
	• Breaks down barriers to deliver the best of Citi. • Measures performance through the lens of our stakeholders. • Invests in colleagues from all backgrounds. • Shows empathy for colleagues, clients and communities.

¹ The financial performance pillar is not applicable for employees in Risk Management, Internal Audit and ICRM.

Goal setting is an opportunity to ensure employees understand how their work aligns with the priorities of their team, business or group, and Citi. Goals reflect these priorities as well as the Citi Leadership Principles required to achieve them. As business priorities evolve, goals are reviewed and revised, and Citi asks managers to review goals to ensure they appropriately reflect the individual employee's role and responsibilities and are aligned to the strategic priorities of the team and business as a whole. Employees are further asked to align their goals to Citi's Performance management pillars.

Employees and managers are encouraged to solicit feedback from a variety of key stakeholders to inform self and manager assessments. Managers should provide coaching and feedback throughout the year on progress relative to goals and how they are being accomplished as defined by the Leadership Principles.

To ensure goal setting is consistent and goals are properly aligned to the strategy of the organisation, Citi operates a top-down goal setting approach. First the organisational strategic goals are set, followed by the objective of each business, followed by individual teams and finally rolling down to the Individual employee.

The goal setting process is not designed to be a one-time process but rather an ongoing process whereby goals can be adjusted to reflect changing priorities and relies on manager supervision and intervention. Where a manager determines that goals are not aligned to an individual's roles and responsibilities, or to the strategic objectives of the organisation, the goals of the individual can be amended or new/additional goals can be cascaded by the manager.

Certain employees are also subject to a range of enhanced performance assessment and accountability processes. Citi's conduct, risk performance and accountability processes and framework continue to be refined, with further enhancements implemented for 2024, including new scope category: Cluster of Breaches, which will place managers with multiple direct reports in-scope of the Accountability Framework Procedure for misconduct in the current annual performance cycle into the Framework themselves.

Other Key Remuneration Policies

Guarantees

Citi has guidelines in place with respect to guarantees which provide that guaranteed incentive awards for employees can only be made in exceptional circumstances, in the context of recruitment, and with reference to the first year of service and provided the Company has a sound and strong capital base. As part of the governance framework, the award of guarantees requires review and approval by the CGML RemCo.

Buyouts

Depending on the terms of the award(s) at the previous employer, a buyout can be provided where outstanding deferred remuneration is actually reduced or revoked by the previous employer, as a consequence of the individual joining the Company, and where the Company (or if permissible the immediate parent) has a sound and strong capital base. Among other criteria, the value of the buyout must be less than or equal to the variable remuneration which has been forfeited, and any buyout must comply with requirements for variable pay, including being subject to appropriate deferral, retention, pay out in instruments and malus / clawback arrangements.

Retention Payments

Retention awards can be made only in exceptional circumstances, for example: during a major restructuring, during a merger process, or where a business is winding down or being sold and particular key staff need to be retained on business grounds. In addition, retention payments can only be made where the employing Company (or if permissible the immediate parent) has a sound and

strong capital base. Any retention payments for MRTs are subject to additional review and approval.

Severance

Severance payments are subject to appropriate governance and approvals. Citi's severance payment guidelines are in line with EBA Guidelines and provide that severance:

- Should not provide for a disproportionate reward, but should represent appropriate compensation for early termination of employment;
- Should not reward failure or misconduct;
- Should comply with relevant collective working agreements or local labour law or other regulatory requirements that apply in country.

The Group generally does not provide guaranteed levels of severance upon early termination of employment. Under the Severance Guidelines, severance pay is discretionary unless otherwise required by local law. Severance pay is based on a number of factors including labour law requirements, statutory rights, and the terms of any collective or workplace agreements which vary country by country.

Remuneration of Control Function Employees

Whilst remuneration levels are influenced by Citi's overall performance, individual compensation for employees in Functions is determined by reference to performance against objectives relevant to their Function and assessed within their respective Functions.

Citi maintains the independence of the compensation process for key Functions (e.g. ICRM and Risk Management) to minimise any scope for potential conflicts of interests. No business has the potential to influence individual awards in the Functions. Employees engaged in Functions have direct reporting lines into the Function managers that are separate from the business. The Function managers are responsible for the reward of those employees both in terms of year-end compensation, salary increases and promotion. Citi ensures performance management and compensation decisions for independent Function personnel are directed by Function management, and not the business unit. The Financial Performance Pillar is not applicable for employees in Risk Management, Internal Audit and ICRM.

Functions are allocated a bonus pool separate from the revenue generating businesses, and decisions about allocations of those pools are made within the Functions themselves.

Dual Regulated MRTs

For MRTs who are subject to MRT rules for multiple legal entities in different jurisdictions, the most relevant regime will apply. This includes rules related to deferral length, post vesting retention periods and malus / clawback arrangements. The remuneration policy for the relevant jurisdiction should be referenced for full details on award structures and regulatory requirements.

Stock holding Requirements

Awards to certain senior executives are subject to stock ownership commitments, further aligning the executives' interests with those of shareholders. In addition, vesting of deferred awards does not accelerate upon termination of employment except in the case of death. This ensures executives' interests remain aligned with those of shareholders even after termination of employment.

Personal Hedging

Citi has trading policies that limit hedging strategies that might otherwise undermine the risk alignment effects of their remuneration arrangements. Citi's Code of Conduct applies to all Citi employees and states that, when considering personal

investments in Citi securities, an individual must avoid any personal trade or investment in a security, derivative, futures contract, commodity, or other financial instrument if the trade or investment might affect or appear to affect the individual's ability to make unbiased business decisions for Citi.

Employees are prohibited from engaging in personal hedging strategies or taking out remuneration or liability related contracts of insurance that undermine or may undermine any risk alignment effects of their remuneration arrangements.

Citi's Personal Trading & Investment Policy ("PTIP") prohibits "Covered Persons", which include MRTs as defined in the PTIP, and related persons from hedging in any manner (other than currency hedges) unvested restricted stock or deferred stock awarded under Citi's Capital Accumulation Program.

Disclosure Requirements

The remuneration statement and tables have been prepared with due consideration of, but not limited to, the remuneration reporting obligations set out in:

- Article 450, CRR II;
- Article 17, Commission Implementing Regulation (EU) 2021/637;
- CRD V;
- EBA implementing technical standards on public disclosures by institutions of the information referred to in titles ii and iii of part eight of regulation (EU) no 575/2013;
- EBA Guidelines on Sound Remuneration Policies; and,
- Policy Statement (PS22/21) Implementation of Basel standards: Final rules.

Table 46: Remuneration awarded for the financial year (UK REM1)

\$ million ¹		MB Supervisory function ²	MB Management function ³	Other senior management ⁴	Other identified staff ⁵	
1	Fixed remuneration	Number of identified staff ⁶	5	4	4.0	504.0
2		Total fixed remuneration ⁷	1.4	7.0	3.7	305.9
3		Of which: cash-based	1.4	6.8	3.6	285.9
UK-4a		Of which: shares or equivalent ownership interests	—	—	—	—
5		Of which: share-linked instruments or equivalent non-cash instruments	—	—	—	—
UK-5x		Of which: other instruments	—	—	—	—
7		Of which: other forms ⁸	—	0.1	0.1	20.1
9	Variable remuneration	Number of identified staff	—	4	4.0	480.0
10		Total variable remuneration	—	5.5	3.9	349.1
11		Of which: cash-based	—	0.6	0.5	80.0
12		Of which: deferred	—	—	—	8.4
UK-13a		Of which: shares or equivalent ownership interests	—	4.8	3.4	267.1
UK-14a		Of which: deferred	—	4.2	2.8	197.5
UK-13b		Of which: share-linked instruments or equivalent non-cash instruments	—	—	—	2.0
UK-14b		Of which: deferred	—	—	—	1.9
UK-14x		Of which: other instruments	—	—	—	—
UK-14y		Of which: deferred	—	—	—	—
15		Of which: other forms	—	—	—	—
16		Of which: deferred	—	—	—	—
17	Total remuneration (2 + 10)		1.4	12.4	7.6	655.0

Additional Notes

¹ All non-USD awards are converted using the European Commission exchange rates for December 2024

² The Management Body ("MB") in its Supervisory Function, includes external Non-Executive Directors and Independent Non-Executive Directors of the Board as at 31 December 2024, as the management body acting in its role of overseeing and monitoring management decision-making, as defined in point (8) of Article 3(1) CRD.

³ The MB in its Management Function reflects Executive Directors of the Board who are employed by the entity as at 31 December 2024, as members of the MB who are responsible for its Management functions.

⁴ Senior Management as defined in point (9) of Article 3(1) CRD, includes formal members of the UK Executive Committee, employed by CGML, its branches and subsidiaries as at 31 December 2024.

⁵ Other identified staff includes those individuals deemed to be Material Risk Takers (MRTs), whose professional activities have a material impact on the institution's risk profile in accordance with the criteria set out in the Commission Delegated Regulation on identified staff implementing Article 94(2) CRD and where appropriate in addition based on institutions' criteria. The population includes any MRTs employed by CGML, its branches and subsidiaries as at 31 December 2024. It excludes those individuals already captured under MB Supervisory function, MB Management function or other senior management.

⁶ Identified Staff is reported as headcount for the MB (integer), with a full time equivalent approach applied for Other Senior Management and Other Identified Staff, and numbers adjusted accordingly for any part time employees.

⁷ Fixed remuneration in cash includes salary and role based allowances where applicable.

⁸ Fixed remuneration in other forms includes the value of pension and benefits.

⁹ Share-based awards are made in Citi shares and represent value at grant.

Table 47: Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) (UK REM2)

	\$ million ¹	MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff ²	—	—	—	1.0
2	Guaranteed variable remuneration awards - Total amount	—	—	—	9.4
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	—	—	—	—
Severance payments awarded in previous periods, that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	—	—	—	—
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	—	—	—	—
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff ²	—	2.0	—	37.0
7	Severance payments awarded during the financial year - Total amount ³	—	1.3	—	28.0
8	Of which paid during the financial year	—	0.7	—	23.4
9	Of which deferred	—	0.6	—	4.6
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap ⁴	—	0.7	—	23.4
11	Of which highest payment that has been awarded to a single person	—	1.0	—	9.0

Additional Notes

¹ All non-USD awards are converted using the European Commission exchange rates for December 2024.

² Identified Staff is reported as headcount for the MB, with a full time equivalent approach applied for Other Senior Management and Other Identified Staff.

³ Severance payments reflect final amounts paid out to MRTs who terminated during 2024, which include redundancy payments and statutory severance.

⁴ None of these severance payments were taken into account in the ratio of variable to fixed remuneration for 2024 performance year, in line with Article 172 of the EBA Guideline on Sound Remuneration Policies.

Table 48: Deferred remuneration (UK REM3)

	Deferred and retained remuneration \$ million ¹	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year ²	Of which vesting in subsequent financial years ³	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. Changes of value of deferred remuneration due to the changes of prices of instruments) ⁴	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year ²	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods ⁵
1 MB Supervisory function		—	—	—	—	—	—	—	—
2 Cash-based		—	—	—	—	—	—	—	—
3 Shares or equivalent ownership interests		—	—	—	—	—	—	—	—
4 Share-linked instruments or equivalent non-cash instruments		—	—	—	—	—	—	—	—
5 Other instruments		—	—	—	—	—	—	—	—
6 Other forms		—	—	—	—	—	—	—	—
7 MB Management function		18.6	2.1	16.5	—	—	3.1	1.6	0.3
8 Cash-based		3.7	0.5	3.2	—	—	—	0.5	—
9 Shares or equivalent ownership interests		14.9	1.6	13.3	—	—	3.1	1.1	0.3
10 Share-linked instruments or equivalent non-cash instruments		—	—	—	—	—	—	—	—
11 Other instruments		—	—	—	—	—	—	—	—
12 Other forms		—	—	—	—	—	—	—	—
13 Other senior management		15.0	4.2	10.8	—	—	2.2	3.7	2.1
14 Cash-based		2.7	1.4	1.4	—	—	—	1.4	—
15 Shares or equivalent ownership interests		12.3	2.9	9.5	—	—	2.2	2.3	2.1
16 Share-linked instruments or equivalent non-cash instruments		—	—	—	—	—	—	—	—
17 Other instruments		—	—	—	—	—	—	—	—
18 Other forms		—	—	—	—	—	—	—	—
19 Other identified staff		927.2	213.8	713.4	—	—	147.8	162.2	65.5
20 Cash-based		131.6	47.1	84.5	—	—	—	56.4	—
21 Shares or equivalent ownership interests		773.6	166.6	607.0	—	—	142.4	105.6	65.5
22 Share-linked instruments or equivalent non-cash instruments		22.0	0.1	21.9	—	—	5.4	0.1	—
23 Other instruments		—	—	—	—	—	—	—	—
24 Other forms		—	—	—	—	—	—	—	—
25 Total amount		960.9	220.1	740.7	—	—	153.1	167.4	67.8

Additional Notes

¹ All non-USD awards are converted using the European Commission exchange rates for December 2024.

² Shares are considered paid when vested. The Fair Market Value (FMV) is determined by the closing New York Stock Exchange stock price for Citigroup common stock the trading day immediately prior to the award's vest date.

³ Value of outstanding share awards is calculated using Citi closing share price as at 31 December 2024.

⁴ Total amount of adjustment during the year due to ex post implicit adjustments has been calculated using:

a. the value at vesting minus the value at 1 January 2024 (or the value at award if awarded in 2024) in relation to amounts due to vest in the financial year; plus

b. the value at 31 December 2024 minus the value at 1 January 2024 (or value at award if awarded in 2024) in relation to amounts vesting in subsequent financial years.

⁵ Value of shares has been calculated as of the vest date for the total outstanding deferred remuneration awarded for previous performance period that has vested but is under restriction as at 31 December 2024.

Table 49: 2024 Remuneration Banding for Annual Compensation of Individuals earning at least EUR 1 million (UK REM4)

	EUR ¹	Identified staff that are high earners as set out in Article 450(i) CRR II ^{2,3}
1	1,000,000 to below 1,500,000	116
2	1,500,000 to below 2,000,000	43
3	2,000,000 to below 2,500,000	23
4	2,500,000 to below 3,000,000	15
5	3,000,000 to below 3,500,000	9
6	3,500,000 to below 4,000,000	7
7	4,000,000 to below 4,500,000	2
8	4,500,000 to below 5,000,000	3
9	5,000,000 to below 6,000,000	2
10	6,000,000 to below 7,000,000	2
11	7,000,000 to below 8,000,000	1
12	8,000,000 to below 9,000,000	—
13	9,000,000 to below 10,000,000	1
14	Greater than 10,000,000	3

Additional Notes

¹ All non-EUR awards are converted using the European Commission exchange rates for December 2024.

² The number of individuals reflects headcount those remunerated over EUR 1 Million within the MRT population as at 31 December 2024.

³ Individuals included in above count are located across a number of countries i.e. France, Germany, Italy, Spain, UAE and the United Kingdom

Table 50: Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) (UK REM5)

\$ million ¹	Management body remuneration			Business areas ⁴						Total
	MB Supervisory function ²	MB Management function ³	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other ⁵	
1 Total number of identified staff										517.0
2 Of which: members of the MB ⁶	5	4	9							
3 Of which: other senior management ⁷				1.0	—	—	—	1.0	2.0	
4 Of which: other identified staff				461.0	—	—	7.0	8.0	28.0	
5 Total remuneration of identified staff	1.4	12.4	13.8	588.3	—	—	9.0	7.3	58.0	
6 Of which: variable remuneration ⁸	—	5.5	5.5	313.9	—	—	5.3	3.3	30.4	
7 Of which: fixed remuneration ⁹	1.4	7.0	8.4	274.4	—	—	3.6	4.0	27.6	

Additional Notes

¹ All non-USD awards are converted using the European Commission exchange rates for December 2024.

² The MB in its Supervisory Function, includes external Non-Executive Directors and Independent Non-Executive Directors of the Board as at 31 December 2024, as the management body acting in its role of overseeing and monitoring management decision-making as defined in point (8) of Article 3(1) CRD.

³ The MB in its Management Function reflects Executive Directors of the Board who are employed by the entity as at 31 December 2024, as members of the MB who are responsible for its Management functions.

⁴ The breakdown by business area includes any MRTs employed by CGML, its branches and subsidiaries as at 31 December 2024. It excludes those individuals already captured under MB Supervisory function or MB Management function.

⁵ All Other category includes all other employees who cannot be mapped into one of the other categories e.g. Client

⁶ Identified Staff is reported as headcount for the MB (integer), with a full time equivalent approach applied for Other Senior Management and Other Identified Staff, and numbers adjusted accordingly for any part time employees.

⁷ Senior Management as defined in point (9) of Article 3(1) CRD, includes formal members of the UK Executive Committee, employed by CGML, its branches and subsidiaries as at 31 December 2024.

⁸ Share-based awards are made in Citi shares and represent value at grant.

⁹ Fixed remuneration includes salary and role based allowances where applicable, and the value of pension and benefits.

Business Conduct

Conduct Risk Management

Citi's Global Conduct Risk Management Policy, Standard and other related policy documents define Citi's enterprise-wide conduct risk management framework and detail the conduct risk management requirements, roles and responsibilities of each Line of Defence. Citi's definition of Conduct Risk is "the risk that Citi or its staff¹ – intentionally or through negligence – harm customers, clients, or the integrity of the markets²."

The conduct risk management framework enhances Citi's culture of compliance and control through the identification, measurement & assessment, monitoring, mitigation along with reporting and escalation of Conduct Risks, in line with Citi's Mission of enabling growth and economic progress, and in support of Citi's Leadership Principles (i.e. qualities, behaviours and expectations required to create a culture that drives excellence, specifically in relation to clients, controls and operations). The Citi Risk Management Committee, a standing committee of the Citi Board of Directors, oversees Citi's conduct risk management framework and Conduct Risk initiatives.

Citi uses a Three Lines of Defence model to manage its risks, including Conduct Risk. In addition, all Lines of Defence owners, are responsible and accountable for identifying their conduct risk exposure inherent in, or arising from, their activities and associated risks and for designing and implementing effective internal controls and maintaining processes for managing their Conduct Risks.

Key elements of the conduct risk management framework include requirements for: conduct risk governance, identification, assessment and management of conduct risks through Citi's risk assessment processes, embedding of conduct risk considerations in hiring, promotion, compensation and performance management; assessment of conduct risks in new activity approval processes, conflicts of interest and complaints management, conduct risk training, disciplinary matters management and analysis, conduct risk reporting, and the prompt escalation of conduct risk concerns.

Consumer Duty

Citi's Consumer Duty Risk Management Standard sets out the requirements to effectively deliver upon the FCA's four key outcomes and overarching objectives of the Consumer Duty, whilst ensuring that the products and services that are manufactured for and/or distributed by Citi's UK legal entities to retail customers meet their financial objectives and do not cause undue harm. This overarching Standard is further supported by guidelines and procedures which set out how the requirements of the Standard and Consumer Duty requirements more generally are operationalised within the relevant in-scope businesses.

Citi's compliance with the Consumer Duty requirements is executed via its Three Lines of Defence model which governs the ongoing embeddedness of the Consumer Duty through identifying, assessing and mitigating the Consumer Duty risk inherent within in-scope businesses. In addition, ongoing monitoring and reporting is provided to the UK Executive Management Committee and the Board through the CGML Audit Committee, as to how Citi is complying with the requirements of the Consumer Duty. Compliance with these requirements is also subject to periodic independent testing by second and third lines of defence.

Conflict of Interest Management

Citi's Code of Conduct (the "Code") along with the Global Conflicts of Interest Management Policy sets forth the requirements for managing Conflicts by Citi, its Businesses, Functions, and

employees to identify and manage Conflicts in accordance with a globally established Conflicts of Interest framework. The Global Conflicts of Interest Management Policy includes expectations with regards to avoiding actual, potential or perceived Conflicts of Interest and sets the requirement that each business and function is to have a set of standards and procedures in place to support the operationalisation of the Global Policy. The Code and the Global Conflicts of Interest Management Policy highlights some of the most common potential conflicts of interest and provides guidance on how to manage, mitigate, record, report and wherever possible, avoid the conflict. This is further supported by embedding conflicts of interest management within relevant training.

Citi's Employment of Relatives Policy establishes minimum standards regarding the employment of immediate family members and other relatives of Citi employees throughout every phase of the employment relationship, such as recruiting, hiring, and internal transfers, unless those standards would conflict with applicable law in any country. This is in conjunction with the Anti-Bribery and Corruption Policy and the Global Anti-Bribery Hiring Procedures.

The Code sets expectations as to personal and related-party business dealings. There are additional responsibilities for Senior Leaders. Directors and senior executives of the Citigroup Inc. legal entity must follow all additional rules regarding pre-approvals of business transactions, as included in the Citi Policy on Related Party Transactions. Additionally, certain executives must adhere to disclosure requirements and limitations on lending relationships with Citi, as included in the Insider Lending Policy.

There are mandatory requirements through Citi's Gifts and Entertainment Standard, Citi outside Directorships and Business Interests Policy, Personal Trading Policy for Citi Access Persons, the Employee Personal Trading and Investment Policy for Citi Brokerage and Advisory Persons, the Client Conflicts of Interest Management Policy, the Citi Anti-Tying Policy, the Bank Affiliate Transactions Policy and the Global Consumer Fairness Policy.

The firm has systems and controls in place concerning information barriers, designed to prevent potential inside information received by workers engaged in lending, investment banking or merchant banking activities (private-side information) from being shared with those workers who trade or advise on trading in financial instruments based on publicly available information or who engage in investment management activities (public-side activities). Citi also uses information barriers to address actual, potential and perceived conflicts of interest among business activities. Citi has established various information barriers and deal-team procedures within businesses engaging in certain private-side activities to prevent confidential information being shared with individuals who are not authorised to know such information.

Internal Alerts and Reporting of Breaches

The Code affirms Citi's Mission and Value Proposition, Leadership Principles, and outlines the standards of ethics and professional behaviour expected of employees and representatives of Citi when dealing with clients, business colleagues, shareholders, communities, and each other. It provides an overview of key legal and regulatory requirements and select enterprise-wide policies that pertain to those requirements, including the obligation of employees to promptly report and escalate concerns where they reasonably suspect or become aware of misconduct. In addition, Citi's Escalation Policy explains who needs to escalate, what to escalate, when to escalate, to whom to escalate and how to follow up on escalations. It includes roles and responsibilities for the identification, investigation and resolution of these concerns, and for oversight of escalation requirements and processes.

¹ Inclusive of employees, non-employees, and third-party staff subject to Citi's policies.

² Inclusive of actions, inactions, omissions, practices, behaviours, and decisions.

Employees are encouraged to raise concerns to their managers in the first instance. If they feel uncomfortable doing so, employees have a number of other resources to whom they can raise their concerns. Employees may raise concerns to any of the following:

- HR, employee, or labour relations representative;
- Internal legal counsel;
- Independent Compliance Risk Management (“ICRM”) Officer;
- Chief Information Security Officer; Information Security Related Events;
- Citi Security and Investigative Services; and,
- The Citi Ethics Office.

The Citi Ethics Office is responsible for administering Citi’s Ethics Hotline, which employees or any other third-party can use to raise concerns. Reports to the Citi Ethics Office can be made anonymously. All contacts to the Citi Ethics Office and related investigations are treated as confidentially as possible consistent with the need to investigate the matter, and subject to applicable laws and regulation.

Citi prohibits any form of retaliatory action against anyone who raises concerns or questions regarding ethics, discrimination, or harassment matters; requests a reasonable accommodation for a disability, pregnancy, or religious belief; reports suspected violations of law, regulation, rule, or breach of policy, standard, procedure, or the Code; or participates in a subsequent investigation of such concerns. Employees who engage in retaliation against a colleague because he or she has raised a concern or question, asked for a reasonable accommodation, reported a violation, or been involved in an investigation, are subject to disciplinary action, up to and including termination of employment or other relationship with Citi.

Nothing in the Code prohibits an individual from communicating with government, regulatory, or self-regulatory agencies about possible concerns, or otherwise providing information to, filing a complaint with, or participating in investigations or proceedings with those agencies. Nor does the Code require an individual to notify Citi of any such communications.

Appendix 1: UK Senior Management and Board Disclosures

The following senior management disclosures are made in accordance with the CRR.

Board Composition, Role and Effectiveness

The selection criteria for the Non-Executive Directors of CGML are designed to ensure their independence and the provision of robust challenge to their executive counterparts.

CGML has a combination of Non-Executive Directors who are either:

- UK based and independent from any of Citi's businesses; or,
- On the parent company's Board (in order to provide direct linkage between the main and subsidiary boards), but who are independent within the standards applicable to the parent board.

All new Non-Executive Directors receive training on the Senior Managers and Certification Regime and Companies Act 2006 responsibilities, as well as Citi orientation for independent Non-Executive Directors.

The selection process for Non-Executive Directors is rigorous and consists of several interviews. The interviewers include the CEO of the relevant legal entity and other Board members. All Board appointments are required to be formally recommended by the CGML Nomination Committee and approved by the CGML Board. For individuals holding senior management functions, this is followed by an application to the PRA and FCA for regulatory approval.

The recruitment process aims to select Non-Executive Directors with significant financial, regulatory and industry expertise. This expertise is outlined in further detail in the biographical summaries later in this appendix.

In order to meet UK regulator expectations for legal entity focus, Citi also appoints a CEO for CGML.

All new Executive Directors of CGML are subject to, but not limited to, the firm's interview selection criteria process pursuant to the firm's Leadership, Ethics and Culture, Competency and Technical Interview Guidelines standards. As with Non-Executive Directors of

CGML, Executive Directors of CGML are subject to background screening pursuant to the PRA and FCA Fitness and Proprietary requirements.

Executive Directors of CGML benefit from the firm's mandatory training requirements including Leadership training programs. All Directors of CGML received induction training on the UK Accountability Regime.

Distinction Between the Roles of Executive and Non-executive Directors

A fundamental distinction is drawn between the roles of Executive and Non-Executive Directors. Non-Executive Directors do not have any business line responsibility but have oversight responsibilities consistent with the approach recommended in the Wates Principles and the Senior Managers and Certification Regime. Non-Executive Directors chair the board and committees, drive the agendas for those meetings and determine any follow up actions. The Non-Executive Directors are also not limited in their oversight to specific business operations.

The resources used by the Non-Executive Directors in their role of challenging the business include:

- Wide-ranging access to the business, which involves the receipt of detailed presentations given by business or control functions;
- Support from the UK Company Secretariat; and,
- Technical training in the form of Board education sessions. These sessions cover a wide range of subjects including but not limited to capital and liquidity requirements, client money and assets regulations, anti-money laundering rules, regulation relating to anti-bribery and corruption, and recovery and resolution planning.

Engagement

The Board is committed to identifying and appointing the best talent from the broadest pools available to serve on the Board and to ensuring that the Board is comprised of individuals whose backgrounds reflect that of our employees, customers and stakeholders.

Table 51: Directorships held by Citigroup Global Markets Limited Board of Directors as of 31 December 2024

Name	Total Number of Directorships*
Jonathan Moulds	11
Sally Clark	5
Evelin Ducsa	1
William Fall	6
Manjira Sen-Gosain	1
Casper von Koskull	7
Tiina Lee	3
Iain Plunkett	4
Amit Raja	1
Graham Westgarth	2
Total	41

*Includes appointments within the same corporate group

Table 52: Membership held by Citigroup Global Markets Limited Board of Directors as of 31 December 2024

Name	Gender	Role	Duration of Board Membership
Jonathan Moulds	Male	Non-Executive Director – Chair	3 years 11 months
Sally Clark	Female	Non-Executive Director	3 years 11 months
William Fall	Male	Non-Executive Director	3 years 11 months
Iain Plunkett	Male	Non-Executive Director	2 year 3 months
Casper von Koskull	Male	Non-Executive Director	1 year 7 months
Tiina Lee	Female	Executive Director – Chief Executive Officer	1 year 3 months
Manjira Sen-Gosain	Female	Executive Director	8 months
Amit Raja	Male	Executive Director	2 year 6 months
Graham Westgarth	Male	Executive Director	9 months
Evelin Ducai	Female	Executive Director	1 year 7 months

Non-Executive Directors of CGML as of 31 December 2024

Jonathan Moulds (Chair)

Jonathan Moulds joined Citi as a statutory Non-Executive Director in February 2021 and is Chair of the CGML Board.

Jonathan is also Chair of the Boards of two public companies: IG Group Holdings, a world leader in derivatives trading and an established member of the FTSE 250 and Litigation Capital Management, one of Australia's most experienced and successful litigation funders. The company is AIM-listed on the London Stock Exchange.

Jonathan most recently served as Group Chief Operating Officer of Barclays PLC. Prior to that, he was Head of Bank of America's European business and became the Chief Executive Officer of Merrill Lynch International following the merger of the two institutions in 2008.

Jonathan holds a number of roles at organisations he has a personal interest in. He is the current Chair of the London Symphony Orchestra Advisory Board, as well as Chair of the London Symphony Orchestra Development Board. Jonathan was awarded a CBE for services to philanthropy in the New Year's Honours list 2014.

Sally Clark

Sally Clark joined Citi as a statutory Non-Executive Director in February 2021 and following receipt of PRA and FCA approval was appointed Chair of the CGML Audit Committee.

Sally is also a Non-Executive Director at BUPA and is a Senior Advisor and Board member at two FinTech start-ups, ACIN and Kore Labs. She also sits on the Advisory Board for a digital platform Career Masterclass. She is a member of the Advisory Board for Pelham Street Leadership Advisory and Coaching, through which she coaches senior executives. She was Chief Internal Auditor at Barclays from 2014 to 2019 having previously been COO and Chief of Staff to the prior Chief Internal Auditor. She worked at the Royal Bank of Scotland ("RBS") Group from 2003-2012, with a stint as head of Operational Risk, Markets and International Banking. In her nine years at RBS, Sally held various audit roles in Wealth and Corporate Markets along with heading up Audit Strategy, Operations and Development. Prior to this, Sally spent 18 years at JP Morgan Chase where she became Audit Partner and Co-Head of Investment Banking Audit for Europe, Middle East and Africa ("EMEA").

Sally has a BA in English from the University of East Anglia, an MBA from the University of Warwick and a Diploma in Executive Coaching from the University of Strathclyde. She is a Fellow of the Institute of Leadership and Management and in her previous roles was a Qualified Internal Audit Leader. Sally has extensive experience in training and development having spent three years as a training manager, delivering courses internally and externally to other banks and regulators, including South Asian Banks and the Federal Reserve Bank on derivatives, leasing, lending and risk management.

William Fall

William Fall joined Citi as a statutory Non-Executive Director in February 2021 and further to PRA and FCA approval was appointed Chair of the CGML Risk Committee.

Since 2020, William is Chair of Ambac UK, the international subsidiary of Ambac Financial Group, the NYSE-listed insurance company, having previously been Non-Executive Director and a member of its Risk and Audit Committee since 2017. He is also Chair of Allied Irish Bank (UK) Ltd, a subsidiary, active in Retail, Commercial and Wholesale Banking, of the largest Irish bank, Allied Irish Bank Group.

Since 2013, he serves as a Non-Executive Director and Member of the Campaign Board and of the Investment Committee of Historic Royal Palaces, a UK charity managing a portfolio of important historical buildings across the UK. Previously, he was Chair of MUFG Europe from 2015 until 2020, having been Senior Independent Director and Chair of Board Risk Committee from 2014. Previously, William was part of the management team brought into the RBS Group, following its partial Government nationalisation, and held the position of Global Co-Head of Institutional Banking. From 1995 to 2006, he worked for Bank of America in various senior leadership positions in Europe and the US, including Group Executive Committee, finally as International CEO between 2002 and 2006. William has broad international experience, as an executive and a Non-Executive, having been resident in the US and UK, with considerable exposure to financial services activities in Latin America, Asia, Middle East and North America.

Casper von Koskull

Casper von Koskull joined Citi as a statutory Non-Executive Director in January 2024 and following receipt of PRA and FCA approval was appointed Chair of the CGML Remuneration Committee in September 2024.

Casper began his career in 1984 with Citibank, working in Frankfurt, New York, London and Helsinki in the bank's derivatives marketing and structuring, leveraged finance and Nordic corporate coverage operations. In 1994, he joined UBS AG in London as a Managing Director for Nordic Investment Banking. He joined Goldman Sachs International in 1998 as a Managing Director in Nordic M&A, eventually becoming a Partner and Head of Nordic Investment Banking. From 2010 to 2019, he held several leadership positions at Nordea Bank Abp, most recently serving as President and Group Chief Executive Officer.

He has been Chairman Fazer Ab since 2021 and served on the Board of Directors of Stena Ab since 2020 and Ahlström Capital Ab since 2021. In addition to his private company boards, he is Chairman of the Board of the European Business Leaders' Convention.

Mr. von Koskull was educated in Finland with a degree in Economics from Aalto University School of Business. He also attended Harvard Business School's Program for Management Development.

Iain Plunkett

Iain Plunkett joined the CGML Board in October 2022. Iain is a highly experienced business transformation & operating leader within the financial services industry globally. He has extensive experience in applying a broad set of levers including technology strategy & implementation, data science & analytics, process reengineering, digital/cloud/channel transformation, innovation, supply chain & organisational effectiveness, amongst others.

During his 30-year career, he has held ExCo level Transformation/CIO/COO leadership roles across capital markets, wealth & asset management, inter-dealer broking, commodities, consumer finance, payments and corporate & retail banking. He has held senior roles for Andresen Consulting, UBS, Barclays, Aberdeen Asset Mgt, TP ICAP & Santander over his career, before which he learned his trade as a Software Engineer & Architect working on highly complex mission critical systems. More recently as an independent senior advisor, Iain has worked with a range of financial services businesses from early stage-fintech firms, established tech firms, PE & Tier 1 financial institutions. Iain is well networked within the tech sector globally including a period serving on the Microsoft Services Advisory Board and was a member of the Innovation Committee of the International Institute of Finance.

After an initial advisory engagement for the CEO of Santander UK, Iain stepped in to successfully design & implement the restructuring of the business as their Chief Operating & Transformation Officer. Iain holds a B.Eng in Information Engineering from Strathclyde University.

Executive Directors of CGML as of 31 December 2024

Tiina Lee (Director and Chief Executive Officer of CGML)

Tiina Lee is Citi's Chief Executive Officer in the UK, UK Cluster & Banking Head and the CEO of CGML. She is responsible for the UK Investment Banking, Corporate Banking and Commercial Banking businesses and chairs the UK Executive Committee.

Prior to joining Citi, Tiina was at Deutsche Bank where she was the Chief Executive Officer for the UK & Ireland. In her time at Deutsche, she led trading and capital markets businesses within Markets and held a number of leadership roles as Head of UK Strategy, UK Chief Operating Officer and Head of Global Markets, UK. Tiina began her 34 year career in investment banking at Hill Samuel Bank and Lehman Brothers in fixed income trading. Tiina sits on the Leadership Council of TheCityUK, a leading industry body and the board of UK Finance. She has been involved in many philanthropic endeavours, currently serving on the Board of Trustees of Donmar Warehouse Projects.

Amit Raja

Amit was appointed the Head of EMEA Markets in July 2022, and a Senior Manager under the UK SMCR. Amit joined Citi in 1997 and has been involved in various forms of Citi's leveraged finance business over many years, starting his career in the Capital Markets Business and subsequently moving into Credit Trading in 2009.

Amit became the EMEA Head of Global Spread Product Trading (previously "Credit Markets Trading") since August 2017 (and subsequent Senior Manager since 2018). Amit has held several leadership positions since joining Credit Trading, including the Global Head of Distressed Trading since 2014, where he managed a team of trading and research professionals in both London and New York, and was responsible for delivering a leading franchise both with respect to market share and revenues across all products including Loans, Bonds, Claims and Equity. He has also held the position of Head Trader for Europe Par Loans and Head of European Leveraged Trading.

Graham Westgarth

Graham Westgarth is the Chief Financial Officer of CGML and of Citi's UK Cluster.

Graham joined Citi in 2007 and has led a number of Finance teams, including more recently as Citi's International Treasury's Head of Capital Planning. Prior to this, Graham was Citi's UK Treasurer, where he led a team responsible for Citi UK's balance sheet and capital and liquidity management, including two designated material institutions. He previously served as Head of Governance and Controls across EMEA Treasury and prior to this, gained experience managing several teams within the EMEA Equity Derivatives Controllers organisation. Graham is a Chartered Management Accountant and also holds the Financial Risk Manager qualification.

Manjira Sen-Gosain

Manjira is the Chief Risk Officer for Citi's UK legal entities. She has been in the role since January 2022 when she joined from HSBC.

Manjira spent 22 years in HSBC covering a variety of roles in Corporate Banking and both Financial and Non-Financial Risk. She started in Mumbai as a coverage banker for Financial Institutions and then onto Corporates (Resources and Energy). After 5 years in Mumbai she transitioned to London.

In late 2008, she moved from Banking into Risk Management at the Group level. She covered Credit and Market Risk and made a transition as the Global Head of Credit, Market and Enterprise Risk for HSBC's Private Bank. Reporting to the EMEA CRO, she then headed Enterprise and Non-Financial Risk for HSBC's non-ringfenced bank and finally moved on to become the CRO for the Global Banking, Markets and Commercial Banking businesses in the same entity. Manjira graduated as an Electrical Engineer and holds a Masters in Business Administration.

Evelin Ducsa

Prior to Evelin being appointed the EMEA Head of Operations and Technology, she was the EMEA TTS Client Experience and Service Head. As of March 2022, Evelin's responsibility expanded to our top 650 revenue Corporate and Financial Institution (FI) clients, to offer globally consistent coverage across our network in alignment with our sales organization's strategy. Evelin is tasked with enhancing our effectiveness across regional & global service managers and has direct management of all Global and Regional Service Managers heads. Evelin will also continue to be responsible for EMEA service and will have direct management of the EMEA core regional and country teams. All EMEA global functions (Digital Client Support, Citi Commercial Banking, and Service Transformation Regional Heads) will matrix report into Evelin.

Prior to this role Evelin was O&T head for the UK cluster based in Moscow and before that O&T head in Hungary with direct responsibility for Consumer O&T for the Central Europe cluster. Evelin has been with Citi for 16 years in addition to 7 years in Operations and Technology leadership roles in HSBC, Erste Bank and Tele2.

Evelin graduated from Corvinus University of Economic Sciences in Budapest and holds a Master of Science in Business Administration specialized in Managerial Decision Support and Foreign Economy and has completed leadership courses on Innovation Leadership at UC Berkeley Executive Education and Leading Client Centric Growth at Wharton Executive Education.

Board Composition Changes since 31 December 2024

Between 31 December 2024 to the publication of this disclosure, Nicola Atkinson has been appointed to the CGML Board of Directors, subject to regulatory approval.

Appendix 2: Capital Instruments Main Features

The template is prepared using the format set out in Annex VII of the PRA rulebook and provides details of CGML's regulatory own fund instruments and eligible liabilities instruments

Table 53: Main features of regulatory own funds instruments and eligible liabilities instruments (UK CCA)

Capital Instruments main features		CET1	CET1	CET1	AT1	AT1	AT1	Tier 2	Tier 2	Tier 2
1	Issuer	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2a	Public or private placement	Private	Private	Private	Private	Private	Private	Private	Private	Private
3	Governing law(s) of the instrument	English Law	English Law	English Law	English Law	English Law	English Law	English Law	English Law	English Law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A	Yes	Yes	Yes	Yes	Yes	Yes
Regulatory treatment										
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1	Tier 2	Tier 2	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Additional Tier 1	Additional Tier 1	Additional Tier 1	Tier 2	Tier 2	Tier 2
6	Eligible at solo/ (sub-)consolidated/ solo & (sub-)consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Ordinary shares	Ordinary shares	Perpetual Notes	Perpetual Notes	Perpetual Notes	Subordinated Loans	Subordinated Loans	Subordinated Loans
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date) ¹	US\$1,500m	US\$18,499m	US\$1,000m	US\$1,800m	US\$500m	US\$2,000m	US\$459m	US\$1,000m	US\$713m
9	Nominal amount of instrument	US\$1.00	US\$1.00	US\$1.00	US\$1,800m	US\$500m	US\$2,000m	US\$600m	US\$1,000m	US\$1,000m
UK-9a	Issue price	US\$1.00	US\$1.00	US\$1.00	N/A	N/A	N/A	N/A	N/A	N/A
UK-9b	Redemption price	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10	Accounting classification	Shareholder's equity	Shareholder's equity	Shareholder's equity	Liability – Fair value option	Liability – Fair value option	Liability – Fair value option	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost
11	Original date of issuance	12.21.1995	12.31.2021	12.21.2023	06.20.2017	06.19.2018	09.16.2021	12.21.2018	12.21.2018	12.21.2018
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Dated	Dated	Dated
13	Original maturity date	N/A	N/A	N/A	N/A	N/A	N/A	10.27.2028	1.24.2039	7.25.2028
14	Issuer call subject to prior supervisory approval	No	No	No	Yes	Yes	Yes	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A	6.20.2022	6.20.2023	6.20.2027	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	Callable by issuer any date after original call date with sufficient notice and requirements, as defined in the conditions of the instrument.	Callable by issuer any date after original call date with sufficient notice and requirements, as defined in the conditions of the instrument.	Callable by issuer any date after original call date with sufficient notice and requirements, as defined in the conditions of the instrument.	N/A	N/A	N/A
Coupons / dividends										
17	Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	Discretionary	Discretionary	Discretionary	8,66%	8,50%	7.21% (SOFR + Margin)	7.23% (SOFR + Margin)	7.53% (SOFR + Margin)	7.24% (SOFR + Margin)
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No	No
UK-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Mandatory	Mandatory
UK-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Fully discretionary	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No	No
22	Non-cumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible

Capital Instruments main features		CET1	CET1	CET1	AT1	AT1	AT1	Tier 2	Tier 2	Tier 2
Coupons / dividends										
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.
32	If write-down, full or partial	N/A	N/A	N/A	Always Fully	Always Fully	Always Fully	Always Fully	Always Fully	Always Fully
33	If write-down, permanent or temporary	N/A	N/A	N/A	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual
UK-34b	Ranking of the instrument in normal insolvency proceedings	1 (most junior)	1 (most junior)	1 (most junior)	2	2	2	3	3	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	As common equity, immediately subordinate to Additional Tier 1	As common equity, immediately subordinate to Additional Tier 1	As common equity, immediately subordinate to Additional Tier 1	Notes constitute direct, unsecured and subordinated obligations of the Issuer and are immediately subordinate to Tier 2 instruments.	Notes constitute direct, unsecured and subordinated obligations of the Issuer and are immediately subordinate to Tier 2 instruments.	Notes constitute direct, unsecured and subordinated obligations of the Issuer and are immediately subordinate to Tier 2 instruments.	Immediately subordinate to Senior Subordinated Debt (Eligible Liabilities)	Immediately subordinate to Senior Subordinated Debt (Eligible Liabilities)	Immediately subordinate to Senior Subordinated Debt (Eligible Liabilities)
36	Non-compliant transitioned features	No	No	No	No	No	No	No	No	No
37	If yes, specify Non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement	N/A - Private Placement

¹ Whilst for recognition in regulatory capital, the Tier 2 instruments reflect the impact of prudential amortisation, the full nominal amount in row 9 remains recognised for the purposes MREL as part of total regulatory capital and eligible liabilities.

Main features of regulatory own funds instruments and eligible liabilities instruments (UK CCA) – continued

Capital Instruments Main Features		Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities
		Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited	Citigroup Global Markets Limited
1	Issuer							
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2a	Public or private placement	Private	Private	Private	Private	Private	Private	Private
3	Governing law(s) of the instrument	English Law	English Law	English Law	English Law	English Law	English Law	English Law
3a	Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Regulatory treatment								
4	Current treatment taking into account, where applicable, transitional CRR rules	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities
5	Post-transitional CRR rules	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities	Eligible Liabilities
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated	Solo and Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Senior Subordinated Loans	Senior Subordinated Loans	Senior Subordinated Loans	Senior Subordinated Loans	Senior Subordinated Loans	Senior Subordinated Loans	Senior Subordinated Loans
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	US\$1,500m	US\$500m	US\$500m	US\$1,200m	US\$1,500m	US\$1,000m	US\$1,500m
9	Nominal amount of instrument	US\$1,500m	US\$500m	US\$500m	US\$1,200m	US\$1,500m	US\$1,000m	US\$1,500m
UK-9a	Issue price	N/A	N/A	N/A	N/A	N/A	N/A	N/A
UK-9b	Redemption price	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10	Accounting classification	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost	Liability – Amortised cost
11	Original date of issuance	12.27.2018	12.27.2018	07.03.2019	12.07.2021	02.25.2022	03.04.2022	09.06.2022
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	07.24.2028	09.29.2027	09.29.2027	03.31.2031	05.03.2032	05.03.2032	09.06.2032
14	Issuer call subject to prior supervisory approval	No	No	No	No	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coupons / dividends								
17	Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	7.11% (SOFR + Margin)	7.17% (SOFR + Margin)	6.15% (SOFR + Margin)	6.14% (SOFR + Margin)	6.82% (SOFR + Margin)	6.60% (SOFR + Margin)	6.82% (SOFR + Margin)
19	Existence of a dividend stopper	No	No	No	No	No	No	No
UK-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
UK-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22	Non-cumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or Non-convertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible	Nonconvertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	Yes	Yes	Yes	Yes	Yes	Yes	Yes
31	If write-down, write-down trigger(s)	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.	Bank of England, Own Fund Instrument written off and Any resolution entity in Citi is under resolution.
32	If write-down, full or partial	Always Fully	Always Fully	Always Fully	Always Fully	Always Fully	Always Fully	Always Fully
33	If write-down, permanent or temporary	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual	Contractual
UK-34b	Ranking of the instrument in normal insolvency proceedings	4 (most senior)	4 (most senior)	4 (most senior)	4 (most senior)	4 (most senior)	4 (most senior)	4 (most senior)
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer	Immediately subordinate to senior unsecured obligations of the issuer
36	Non-compliant transitioned features	No	No	No	No	No	No	No
37	If yes, specify Non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A – Private Placement	N/A – Private Placement	N/A – Private Placement	N/A – Private Placement	N/A – Private Placement	N/A – Private Placement	N/A – Private Placement

Appendix 3: Countercyclical Capital Buffer

The below table shows our countercyclical buffer (“CCyB”) requirement broken down by geographical distribution in line with Article 440 of the CRR. Countries that have a CCyB requirement or have an own funds requirement greater than 2% are separately disclosed.

Table 54: Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (UK CCyB1)

Breakdown by country	General credit exposures	Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure values	Own funds requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit risk exposures – Market risk	Relevant credit risk exposures – Securitisation positions in the non-trading book				
Armenia	—	—	—	—	—	—	—	—	—	—	—	1.50%
Australia	1,313	52	3	—	1,368	105	7	—	112	1,403	2.5%	1.00%
Belgium	13	5	14	—	31	1	2	—	2	27	—	1.00%
Bulgaria	—	—	—	—	—	—	—	—	—	—	—	2.00%
Chile	3	2	—	—	5	—	—	—	—	5	—	0.50%
Croatia	—	—	—	—	—	—	—	—	—	—	—	1.50%
Cyprus	—	—	—	—	—	—	—	—	—	—	—	1.00%
Czech Republic	128	4	13	—	144	10	2	—	12	148	0.3%	1.25%
Denmark	462	14	2	—	478	26	1	—	27	341	0.6%	2.50%
Estonia	—	—	—	—	—	—	—	—	—	—	—	1.50%
France	1,799	241	341	—	2,382	114	54	—	168	2,100	3.8%	1.00%
Germany	1,085	345	365	—	1,796	82	64	—	146	1,828	3.3%	0.75%
Hong Kong	2,726	63	1	—	2,789	218	20	—	238	2,976	5.3%	0.50%
Hungary	13	1	—	—	14	1	—	—	1	14	—	0.50%
Iceland	—	—	—	—	—	—	—	—	—	—	—	2.50%
Ireland	2,058	73	35	7	2,172	167	19	5	191	2,384	4.3%	1.50%
Israel	1,237	7	1	—	1,245	99	1	—	100	1,246	2.2%	—
Japan	1,070	557	4	—	1,631	77	39	—	116	1,451	2.6%	—
Korea, Republic Of	251	48	—	—	299	20	8	—	28	347	0.6%	1.00%
Latvia	3	—	—	—	3	—	—	—	—	3	—	0.50%
Lithuania	—	—	—	—	—	—	—	—	—	—	—	1.00%
Luxembourg	3,937	70	130	—	4,137	315	23	—	338	4,224	7.6%	0.50%
Netherlands	2,105	206	75	—	2,385	152	19	—	171	2,135	3.8%	2.00%
Norway	185	7	—	—	192	11	—	—	11	139	0.2%	2.50%
Romania	10	2	—	—	12	1	—	—	1	12	—	1.00%
Singapore	1,724	47	—	—	1,770	138	8	—	146	1,823	3.3%	—
Slovakia	—	—	—	—	—	—	—	—	—	—	—	1.50%
Slovenia	—	—	—	—	—	—	—	—	—	—	—	0.50%
South Africa	21	21	—	—	43	2	2	—	3	43	0.1%	0.08%
Sweden	737	20	101	—	858	59	12	—	71	885	1.6%	2.00%
Switzerland	1,328	10	65	—	1,404	102	7	—	109	1,360	2.4%	—
United Kingdom	11,489	1,224	1,826	—	14,539	857	311	—	1,169	14,612	26.1%	2.00%
United States	8,069	528	159	—	8,756	617	52	—	669	8,361	15.0%	—
Other countries	6,515	1,024	623	—	8,161	508	136	—	644	8,053	14.4%	—
Total	48,281	4,570	3,756	7	56,614	3,683	786	5	4,473	55,917	100.0%	—

Table 55: Amount of institution-specific countercyclical capital buffer (UK CCyB2)

Total Risk Exposure Amount (\$ million)	146,156
Institution Specific Countercyclical Buffer Rate	0.88%
Institution Specific Countercyclical Buffer Requirement (\$ million)	1,283

Appendix 4: Omissions

Please see below a list of disclosures not included in CGML's Pillar 3.

Table 56: Non-disclosed tables

Table	Rationale
UK INS1 - Insurance participations	No insurance participation activity or financial conglomerates for CGML
UK INS2 - Financial conglomerates information on own funds and capital adequacy ratio	
UK CR2: Changes in the stock of Non-performing loans and advances	
UK CR2a: Changes in the stock of Non-performing loans and advances and related net accumulated recoveries	Templates excluded on the basis of immateriality or non-applicability
UK CQ1: Credit quality of forborne exposures	
UK CQ2: Quality of forbearance	
UK CQ4: Quality of Non-performing exposures by geography	
UK CQ5: Credit quality of loans and advances by industry	
UK CQ6: Collateral valuation - loans and advances	
UK CQ7: Collateral obtained by taking possession and execution processes	
UK CQ8: Collateral obtained by taking possession and execution processes - vintage breakdown	
UK CR10 - Specialised lending and equity exposures under the simple risk weighted approach	No specialised lending or equity exposures under the simple risk weighted approach for CGML
UK CR6 - IRB approach - Credit risk exposures by exposure class and PD range	CGML does not have an IRB permission
UK CR6-A - Scope of the use of IRB and SA approaches	
UK CR7 - IRB approach - Effect on the RWAs of credit derivatives used as CRM techniques	
UK CR7-A - IRB approach - Disclosure of the extent of the use of CRM techniques	
UK CR8 - RWA flow statements of credit risk exposures under the IRB approach	
UK CR9 - IRB approach - Back-testing of PD per exposure class (fixed PD scale)	
UK CR9.1 - IRB approach - Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)	
UK CCR4 - IRB approach - CCR exposures by exposure class and PD scale	
UK-SEC3 - Securitisation exposures in the Non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	CGML only acts as an investor in its Securitisation book
UK-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	

Abbreviations

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

ALCO	Asset and Liability Committee	EVS	Economic Value Sensitivity
AMA	Advanced Measurement Approach	FCA	Financial Conduct Authority
ALMM	Additional Liquidity Monitoring Metrics	FCCM	Financial Collateral Comprehensive Method
ASF	Available stable funding	FinCRO	Finance Risk
AVA	Additional Valuation Adjustment	FINREP	Financial Reporting Standards
BICR	Banking & International Credit Review	FLP	Funding and Liquidity Plan
BRCC	Business Risk and Control Committee	FMV	Fair Market Value
BSST	Business Specific Stress Test	FPC	Financial Policy Committee
CCAR	Comprehensive Capital Analysis and Review	FRB	Federal Reserve Board
CCF	Credit Conversion Factor	FRR	Facility Risk Rating
CCP	Central Counterparty	FVA	Funding Valuation Adjustments
CCR	Counterparty Credit Risk	FX	Foreign Exchange
CCyB	Countercyclical buffer	GAAP	Generally Accepted Accounting Principles
CDS	Credit Default Swap	G-SII	Global Systemically Important Institution
CEO	Chief Executive Officer	GSST	Global Systemic Stress Test
CET1	Common Equity Tier 1	GWWR	General Wrong Way Risk
CFO	Chief Finance Officer	HMT	His Majesty's Treasury
CFP	Contingency Funding Plan	HQLA	High-Quality Liquid Assets
CGME	Citigroup Global Markets Europe AG	ICAAP	Internal Capital Adequacy Assessment Process
CGML	Citigroup Global Markets Limited	ICRM	Independent Compliance Risk Management
CITI	Citigroup Inc.	IFRS	International Financial Reporting Standards
CoB	Continuity of Business	ILAAP	Internal Liquidity Adequacy Assessment Process
CPC Committee	Compensation, Performance Management and Culture Committee	IM	Initial Margin
CRD	Capital Requirements Directive	IMA	Internal Model Approach
CRGF	Collateral Risk Governance Forum	IMM	Internal Models Method
CRM	Credit Risk Mitigation	IRC	Incremental Risk Charge
CRMF	Climate Risk Management Framework	IRE	Interest Rate Exposure
CRO	Chief Risk Officer	IRM	Independent Risk Management
CRR	Capital Requirements Regulation	IRRBB	Interest Rate Risk in the Banking Book
CSA	Credit Support Annex	LCR	Liquidity Coverage Ratio
CVA	Credit Valuation Adjustment	LGD	Loss Given Default
DFAST	Dodd-Frank Act Stress Tests	LREQ	UK Leverage Ratio - Capital Requirement & Buffers
DIRAP	Discretionary Incentive and Retention Award Plan	LRM	Liquidity Risk Management Policy
EAD	Exposure at Default	LSO	London Symphony Orchestra
EBA	European Banking Authority	MAO	Material Adverse Outcome
ECAI	External Credit Assessment Institution	MAT	Management Action Trigger
ECL	Expected Credit Loss	MB	Management Body
EE	Expected Exposure	MCA	Manager's Control Assessment
EMEA	Europe, Middle East and Africa	MLE	Material Legal Entity
EMT	Executive Management Team	MREL	Minimum Requirement for Own Funds and Eligible Liabilities
EEPE	Effective Expected Positive Exposures	MRT	Material Risk Takers
ERBA	External Ratings Based Approach	MTM	Mark-To-Market
ERM	Enterprise Risk Management	NII	Net Interest Income
ERMF	Enterprise Risk Management Framework	NSFR	Net Stable Funding Ratio
EU	European Union	ORM	Operational Risk Management
EVE	Economic Value of Equity	ORMF	Operational Risk Management Framework

ORR	Obligor Risk Rating
OTC	Over The Counter
PD	Probability of Default
PFE	Potential Future Exposure
P&L	Profit and Loss
PRA	Prudential Regulation Authority
PRF	Prudential Resource Forum
PSU	Performance Share Unit
PTIP	Personal Trading & Investment Policy
RBA	Role Based Allowances
RBS	Royal Bank of Scotland
RCSA	Risk & Control Self-Assessment
RemCo	Remuneration Committee
RNIM	Risks-Not-In-Model
RSF	Required stable funding
RWA	Risk Weighted Assets
SA	Standardised Approach
SEC-ERBA	External ratings-based approach for securitisation positions
SEC-IAA	Internal assessment approach for securitisation positions
SEC-IRBA	Internal ratings-based approach for securitisation positions
SEC-SA	Standardised approach for securitisations
SFT	Securities Financing Transaction
SREP	Supervisory Review and Evaluation Process
SOFR	Secured Overnight Financing Rate
SVaR	Stressed Value at Risk
SWWR	Specific Wrong Way Risk
TFA	Total Facilities Amount
TPA	Transformation Program Award
TSA	Standardised Approach
VaR	Value at Risk
VM	Variation Margin
WWR	Wrong Way Risk

