2025

Sustainability Report

citi

What's Inside

About This Report

This report illustrates how we bring our mission of enabling growth and economic progress to life through our business, including through our key sustainability initiatives.

In preparing this report, we reference relevant sector standards from the Sustainability Accounting Standards Board (SASB) and the U.N. Guiding Principles on Business and Human Rights (UNGP) framework (see related indices). Further information on certain matters discussed in this report can be found in our 2024 Climate Report and Environmental and Social Policy Framework. All reporting and performance data are limited to information for the owned and operated facilities of Citigroup Inc. and its subsidiaries, unless stated otherwise. Additional information about Citi can be found on our website. For more information, please visit citigroup.com.

2025 Sustainability Report v1, July 2026

Note on Materiality

This report is intended to help our stakeholders better understand our sustainability initiatives. The information provided in this report differs in significant ways from our mandatory reporting, including under U.S. Securities and Exchange Commission (SEC) rules and regulations and applicable stock exchange listings, and may consider different and broader concepts of materiality promulgated by other frameworks and reporting guidelines. Thus, while certain matters discussed in this report may be significant, any significance should not be read as necessarily rising to the level of materiality used for the purposes of complying with the U.S. federal securities laws, EU requirements and regulations, or any other regulatory purpose, even if we use the word “material” or “materiality” in this report. Further, our voluntary sustainability-related disclosures address a range of topics that we believe are relevant to our businesses and are of interest to investors and other stakeholders. This approach means that this report and our other voluntary disclosures capture details on sustainability-related matters that are not required to be included in our regulatory-required disclosures.

Statements made in this report and other voluntary disclosures may use a greater number of assumptions and estimates than many of our required disclosures. These assumptions and estimates are likely to change over time and, when coupled with the longer time frames used in these sustainability-related disclosures, make any assessment of materiality inherently uncertain.

In certain situations, this report discusses products that the firm hopes will help Citi clients meet their sustainability objectives and references our own goals that we hope will have a positive impact, but these positive impacts are not guaranteed. The statements in this report, which is unaudited, are made based on information available as of the date of its publication and are subject to change; the links and websites referred to in the report provide supplemental information but are not incorporated by reference in, and do not form part of, the report.

Letter From Our Chair and CEO

A new world order is emerging. Repeated geopolitical shocks have reshaped the global landscape. Governments are taking a more aggressive role in shaping markets and industries. The movement of trade and capital is becoming more multipolar. And AI is transforming entire industries, shifting energy demands and changing how countries and companies compete.

Clients tell us that amidst the new global dynamics, building resilience into their business models is no longer a defensive tactic; it is a competitive necessity. In this context, Citi's role as a source of stability and strength for both our clients and the broader system has renewed urgency.

This report highlights how our approach to sustainability fits into our strategy of building resilience within our firm and outside of it.

First, we are supporting our clients by mobilizing our capital and expertise as they pursue their own sustainability journeys, as we continue to make progress towards our goal of providing $1 trillion in sustainable finance by 2030. Over the past six years, we have financed and facilitated more than $647 billion in transactions that support innovative sustainable infrastructure, economic development and the energy transition, whilst leveraging our commercial capabilities and insights.

In 2025, that included financing:

- A local currency securitization equivalent to $156 million to scale affordable solar access across Kenya, enabling 1.4 million low-income households and businesses to access electricity and smartphones;
- A $330 million bond (the world's first certified climate resilience bond) to aid Tokyo in addressing critical environmental challenges from weather-related events; and
- In the United States, expanded access to primary care in rural areas through Citi Impact Fund's direct equity investment in Hopscotch, which focuses on high-quality care for Medicare and Medicaid/Medicare patients.

Second, we are investing in the resilience of our communities. For the 16th year in a row, Citi is proud to be the number one affordable housing lender in the United States. Through Citi Community Capital, we provided approximately $7.7 billion to finance affordable housing in 2025. The over-36,600 total units we financed last year include housing for seniors, veterans and individuals with special needs. Beyond these activities, we marked key milestones for our flagship community investment programs: five years of the Citi Impact Fund, 20 years of Citi Global Community Day and 30 years of the Citi Foundation. Through the Citi Impact Fund, we have allocated more than $200 million to 56 companies developing innovative solutions to address community challenges. In 2025 alone, the Citi Foundation provided more than $53 million in grants to community innovators.

Third, we are continuing to reduce the environmental footprint of our own operations. On my first day as CEO in 2021, in addition to net zero emissions in our financing by 2050, Citi committed to net zero greenhouse gas emissions by 2030 in our operations. In 2025, we closed out a series of operational footprint goals, such as achieving 58% reduction in greenhouse gas emissions and a 43% reduction in energy consumption. While we met our goals for water consumption and waste reduction, we recognize that we fell short of our ambition to consume more reclaimed water and divert more waste from landfills. We will continue to strive for improvements in these areas.

Across our work, we remain laser-focused on fulfilling our mission of enabling growth and economic progress. We take seriously our responsibility to maintain strong governance processes and prudently manage our risk — including environmental and social risks — while adhering to the highest ethical standards.

For more than 200 years, Citi has helped our clients navigate some of the world's most complex challenges. At another moment of global transformation, we stand ready to help our clients and communities shape what comes next.

Jane Fraser
Chair and Chief Executive Officer

Jane Fraser

2025 Sustainability Highlights

Sustainable Finance

We support scalable financial solutions to help our clients build their businesses and address environmental and societal challenges.

- Have financed and facilitated an estimated **$647.2B** since 2020 toward our $1 Trillion Sustainable Finance Goal by 2030
- Helped avoid an estimated **8.8M** metric tons of greenhouse gases (GHG), supported approximately **4.4M+** jobs and impacted an estimated **67M** people worldwide since 2020, through our financing
- Provided more than **19.2M** low-income households in emerging markets worldwide with access to essential goods and services between 2021 and 2025
- Named the **#1** affordable housing lender in the U.S. for the 16th consecutive year, according to Affordable Housing Finance
- Released a Sustainable Finance Framework and Sustainable Issuance Framework

Environmental Impact and Climate Risk

We take a comprehensive approach to managing climate risk in our operations and our financing activities and work to integrate sustainable practices across our company.

- Achieved **six out of eight** of our 2025 Operational Footprint goals across all five categories related to GHG emissions, energy, water and waste reduction, and sustainable buildings
- Maintained **100%** renewable electricity sourcing for our operations
- Captured or sourced ~ **85 million** gallons of reclaimed water for use globally in 2025
- Earned **302** sustainable building certifications through LEED, WELL and equivalent standards as of the end of 2025

Strengthening Communities

We help expand economic opportunity in communities where we do business by supporting financial inclusion, small business and job development, affordable housing, workforce readiness and crisis response.

- Marked **5** years for the Citi Impact Fund, **20** years for Citi Global Community Day and **30** years for the Citi Foundation
- Have allocated more than **$200M** since 2020 in **56** companies developing innovative solutions to address community challenges through the Citi Impact Fund, as of December 2025
- Provided more than **$53M** in grants to community innovators bringing new solutions to long-standing challenges, through the Citi Foundation in 2025
- Volunteered in more than **1.2M** engagements around the world over two decades through our annual Global Community Day

Human Capital Management

Our people strategy advances the competitive strength of our workforce to enable growth and innovation.

- Achieved global gender and U.S. racial pay gaps of less than **1%** in each case, on an adjusted basis
- Promoted more than **31,000** colleagues who took on new roles and responsibilities
- Delivered more than **8.9M** professional development hours, with an average of **24.2** hours per person
- Surveyed colleagues, **95%** of whom feel accountable to identify and escalate issues that present risks to our firm

Responsible Business

We prioritize responsible business practices with a strong commitment to — and governance systems that support ethics and integrity, risk management, safeguarding data, protecting customer information and privacy, respect for human rights and serving our customers and clients responsibly.

- Provided training to employees and contingent workers related to our standards for ethics, risk management and the fair provision of financial services
- Conducted **1,408** environmental and social risk consultations related to transactions and client relationships in 2025

Sustainability at Citi

Citi's mission is to serve as a trusted partner to our clients by responsibly providing financial services that enable growth and economic progress. Our core activities are safeguarding assets, lending money, making payments and accessing the capital markets on behalf of our clients.

Citi's approach to sustainability supports building resilience within our firm, as well as for the millions of people we serve across countries and cities worldwide. Our vision is for Citi to be the preeminent banking partner for institutions with cross-border needs, a world leader in wealth management and a valued personal bank in our home market of the U.S. For more than two centuries, we have been honing our resources and expertise to help our clients and communities navigate and embrace the opportunities of our increasingly complex world. This approach is as fundamental to the way we help our clients sustain their operations for the future as it is to the strength of our own business.

To help us achieve this vision, we think globally, bringing our experience as the world's most global bank, as well as our local knowledge; we are simplifying our bank to focus where clients need us most and help them stay ahead of evolving trends and challenges; we are increasing connectivity across our enterprise to bring more integrated and impactful services to our clients and customers; and we are investing in our people, building a high-performing culture focused on helping our clients succeed.

Our business model is grounded in the belief that responsible management of sustainability and business responsibility topics helps to improve corporate resiliency, mitigate risk and drive value generation. With this in mind, we have identified sustainability-related topics that we believe are of interest to our business, colleagues, clients and communities. They include sustainable finance, environmental impact and climate risk, strengthening communities, human capital management and responsible business — all of which contribute to our business objectives. Across the firm, these topics are integrated into our five interconnected businesses and long-term initiatives, as well as into the way Citi teams support our clients and communities with services and products to help them achieve their goals.

Services

Our Services business provides global solutions that help corporations, financial institutions, public-sector and commercial clients optimize operations and drive their businesses forward. This business supports clients by providing liquidity and working capital management solutions, including export and agency finance; green, social and sustainable trade and working capital loans; sustainable supply chain finance; and sustainable deposit and cash management solutions. Please see our website for more information about Services.

Markets

Our Markets business serves corporations, institutional investors and governments from trading floors in almost 80 countries. The strength of our underwriting, sales and trading and distribution capabilities spans asset classes (commodities, equities, rates, spread products) and currencies, providing us with an unmatched ability to meet the needs of our clients. In addition, our Markets teams work with our clients to address the challenges and capture the opportunities presented by the transition to a low-carbon economy. Markets activities range from providing products that allow our institutional investor clients to participate in decarbonization activities or align their portfolios with their sustainability objectives, to helping corporate clients hedge price risk for transition-related commodities or manage their carbon market obligations. Please see our website for more information about Markets.

Banking

Our Banking franchise is organized around three lines of business: Investment Banking, which provides advisory, debt and equity capital markets solutions for corporations, governments and financial institutions; Corporate Banking, which ensures we deliver the full power of Citi's product suite to our clients; and Commercial Banking, a solutions-led business for the demands of mid-sized and emerging corporations. Our Banking teams support clients of varying sizes and across sectors, as they seek to achieve their sustainability objectives. These teams apply deep knowledge of sector-specific transition strategies to help realize opportunities for clients, offering advisory services, capital markets (e.g., sustainability bonds and sustainability-linked financing) and corporate banking solutions for transactions. Please see our website for more information about Banking.

Wealth

Our Wealth business offers managed opportunities, alternative investments and tailored exposure to capital markets, to help clients pursue their financial objectives. Our wealth management platform delivers comprehensive solutions to clients, with integrated advice and execution, as well as traditional and alternative investments, managed account strategies, research and investment portfolio guidance. Investing with Purpose, Wealth's sustainable investing offering, encompasses four approaches that seek competitive risk-adjusted performance alongside varied sustainability objectives and outcomes: socially responsible, environmental and social integration, thematic and impact. Please see our website for more information about Wealth.

U.S. Consumer Cards

Our U.S. Consumer Cards business offers branded, co-branded and private label cards, as well as installment lending solutions. Our strategy is to provide over 70 million customers with digital-first, industry-leading products, services, benefits and experiences. Please see our website for more information about U.S. Consumer Cards.

Governance of Environmental and Social Matters at Citi

Good governance is a fundamental principle at Citi, and we aim to incorporate best practices. Our corporate governance structures, policies and processes promote a culture that enables accountability and ethical conduct across our firm. We comply with the laws, rules and regulations that govern our businesses. We strive to report on our activities with accuracy and transparency.

The Citi Board of Directors has ultimate oversight of our work to identify, assess and integrate sustainability-related risks and opportunities throughout Citi, including our climate-related work and human capital management efforts.

In addition to oversight by the full Board, the Nomination, Governance and Public Affairs Committee of the Board is responsible for overseeing and reviewing policies and programs for environmental sustainability, human rights and community investment. The Risk Management Committee of the Board reviews key risk policies, including those related to climate risks. The Audit Committee has oversight over the controls and procedures related to Citi group-level sustainability-related reporting. The Compensation, Performance Management and Culture Committee has oversight over Citi management's efforts to reinforce sound ethics, responsible conduct and principled culture within Citi.

For more information on the roles and responsibilities of the committees, see the Citi Board of Directors' Committee Charters.

In addition, Citi's Sustainability Council provides a senior management forum for oversight of our environmental and social commitments and priorities, including sustainable finance progress, climate data governance and updates on progress toward our net zero financing and operations goals.

Citi continues the disciplined work of strengthening our risk and controls foundations. Through our Transformation, we have clarified accountability, improved data quality and embedded stronger oversight into how we operate. Risk management is fully integrated into daily decision-making — from identifying emerging risks to stress-testing them. As of publication, more than 90% of our Transformation programs are now at or near Citi's target state. That progress reflects higher-quality data, clearer ownership and faster, more informed decisions.

Remuneration

Citi incorporates sustainability-related goals into relevant executive scorecards, which are elements of performance management tied to the determination of incentive compensation for these executives.

Scorecards for multiple members of the Executive Management Team and senior management have recently included supporting the development and operationalization of our net zero approach and applicable 2030 interim targets, and our $1 Trillion Sustainable Finance Goal.

Climate change strategy and risk management performance goals are incorporated into annual goals and performance review processes for a number of our senior executives and their teams who are responsible for developing and executing our strategies around climate change.

Stakeholder Engagement at Citi

We hold ourselves accountable to our commitments and are transparent with our stakeholders about the progress we are making.
The table below describes the types of activities we undertake to engage with our stakeholders based on this approach.

Stakeholder Group	How We Engage
Clients and Customers	• Meetings to share our approach to addressing sustainability-related risks and opportunities and understand our clients' approaches to those topics • Social media, including our Customer Service X handle (@ AskCiti) • Customer satisfaction survey • Citi Blog
Communities	• Specialized websites, including our Strengthening Community website • Collaboration with community organizations and NGOs on issues relevant to their organizations and our business • Dialogue sessions with community-based organizations and advocates • Employee volunteering events • The Citi Foundation, which provides grants and works with community organizations and nongovernmental organizations (NGOs)
Employees	• Company intranet, email, mail and meetings • Voice of the Employee survey • Inclusion Networks and Citi Green Champions • Online training • Performance reviews • Citi Blog
Governments and Regulators	• Meetings, briefings, letters, industry association events, public policy forums, public conferences, roundtables and convenings • Membership on industry association boards
Investors	• Group calls and meetings (quarterly earnings calls, conferences and Citi-hosted group meetings) • One-on-one meetings to discuss financial performance and sustainability topics • Communications through our Investor Relations and Corporate Governance teams
Stakeholder Groups and NGOs	• Industry groups, roundtables, workshops and events • Ongoing dialogue with NGOs to understand and address concerns where possible, fostering transparency and understanding
Suppliers	• Meetings, calls, conferences and workshops • Supplier requirements and principles

Sustainable Finance

Our clients face an increasingly challenging environment with new risks and expectations, including shifts in technology, regulation, supply chains and capital flows. At Citi, we help clients capture emerging opportunities and manage the risks of our fast-changing world in ways that deliver long-term value. We provide advisory support and mobilize capital to respond to our clients' needs, fund pioneering advancements and support capital market activities.

Citi aims to help clients advance their priorities, including in ways that address access to basic necessities and work toward an energy transition that creates jobs, strengthens energy stability and security, and promotes equitable economic growth.

Through our global footprint and capabilities, we help our corporate, financial institution and public-sector clients reach their strategic goals, whether financing strategies for climate resilience and adaptation or providing basic infrastructure at the last mile. We find that sustainable finance can be a part of our wider strategic priorities in serving our clients. For example, to support the estimated $3 trillion in financing that will be needed by 2030 to fund data center and other AI infrastructure capacity, Citi has formed a dedicated AI Infrastructure Banking team. The team's remit includes opportunities to support clients in the financing of energy-efficient data centers and infrastructure. Collaborating across sectors, the team aligns Citi expertise and resources to deliver needed financing.

Sustainable Debt Activities

Citi continued to be a trusted advisor to issuers of Green, Social, Sustainability and Sustainability-linked (GSSS)[1] labeled debt in 2025, underwriting over 200 transactions. Citi was a top five underwriter[2] for global GSSS bonds in 2025 and the #2 underwriter of emerging market GSSS bonds in 2025.[2] Citi also helped structure a number of sustainable financing frameworks for banking, metals and mining, power and utilities, real estate and sovereign issuers in 2025. Citi was at the forefront of developments in the European sustainable finance markets, as a sustainability coordinator and joint lead manager on the first-ever European Green Bond (EuGB) issuance in January 2025 by A2A, and further supporting €2.5 billion ($2.9 billion) of EuGB issuance in 2025.[3]

Our own green and social bonds and sustainable deposit offerings are an integral component of our sustainable finance activities. In 2025, Citi published a Sustainable Issuance Framework, consolidating our Green Bond Framework, Social Bond Framework for Affordable Housing and Social Finance Framework, which were developed in line with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles, respectively. Read more about our impact in our 2025 Green and Social Bond Report.

Clean Technology and Climate Resilience

Pioneering Sustainable Resilience Finance in Japan

OUR ROLE: SUSTAINABILITY STRUCTURING AGENT AND JOINT LEAD MANAGER

Tokyo's resilience bond is the world's first certified against the Climate Bonds Resilience Taxonomy, which aims to expand the focus of climate bonds to include adaptation and resilience finance.[4]

Tokyo Metropolis successfully priced a $330 million bond to address critical environmental challenges, pioneering a new market for resilience finance. Eligible projects include flood and damage prevention from weather-related events. Proceeds of the offering will be used exclusively for initiatives under the TOKYO Resilience Project, launched in 2022.[4]

Citi acted as the sustainability structuring agent and joint lead manager, having previously facilitated the successful issuance of two climate resilience bonds. These issuances highlight our commitment to innovative financial solutions addressing critical environmental challenges.

[1] As defined by the ICMA Sustainable Finance Principles, https://www.icmagroup.org/sustainable-finance/.
[2] Per YE2025 Bloomberg League Tables data.
[3] Source: Dealogic.
[4] "Tokyo Plans First-Ever Climate Resilience Bond Offering" (October 16, 2025), ESG Today, https://www.esgtoday.com/tokyo-to-raise-330-million-in-first-ever-climate-resilience-bond-issuance.

With our strong connections to local communities, we support clients in providing solutions that address economic inclusion and access to essential goods and services for underserved communities around the world. We leverage our firm's balance sheet, our local expertise and our access to global markets to help our corporate, financial institution and public-sector clients reach their strategic goals.

For example, social finance supports solutions that address economic inclusion and access to essential goods and services, including affordable housing, education, healthcare and basic infrastructure for underserved communities around the world — basic necessities that billions of people around the world lack. Connecting marginalized individuals to life-changing essential services and infrastructure helps advance global economic progress and social growth.

As part of our social finance focus, we set a goal to invest in opportunities for 15 million low-income households globally, including 10 million women, by 2025. Between 2021 and 2025, Citi supported access to essential goods and services for more than 19.2 million low-income households in emerging markets worldwide, including an estimated 8.7 million women. We take a conservative approach to estimation, which may result in understated cumulative impact. For transactions where it was not feasible to estimate number of households and/or women reached due to limited data availability, impact has not been included in total social impact numbers.

We track our sustainable financing, investing and advisory activities through our $1 Trillion Sustainable Finance Goal by 2030. We are proud to have financed and facilitated $647.2 billion toward our $1 Trillion Sustainable Finance Goal.

2025 Sustainable Finance Awards

Awards recognized externally in 2025 and 2026

Environmental Finance Sustainable Debt Awards:

Lead Manager of the Year, Social Bonds — Sovereign

Lead Manager of the Year, Sustainability Bonds — Financial Institution

Social Bond of the Year — Financial Institution

Green Bond of the Year awarded to DP World for its 2024 issuance of a $100 million blue bond, structured and led by Citi

Affordable Housing Finance: #1 Affordable Housing Lender in the U.S.

for the 16th consecutive year

Environmental Finance Middle East Transition Finance Awards

Lead Manager of the Year, Sustainability Bonds

Affordable Basic Infrastructure | Economic Inclusion | Renewable Energy

Expanding Affordable Solar Access in Kenya

OUR ROLE: LEAD ARRANGER

Sun King's new securitization is expected to enable an estimated 1.4 million low-income households and businesses to access electricity and smartphones, many for the first time.[5]

Sun King, the world's largest off-grid solar energy company, closed a landmark local securitization currency equivalent to $156 million, the largest local currency securitization ever completed in sub-Saharan Africa outside South Africa, to scale affordable solar across Kenya. Arranged and structured by Citi, the securitization was backed by five international and local commercial banks and three development finance institutions. It builds on Sun King's award-winning $130 million securitization completed in 2023, which Citi also arranged and structured. The securitization enables Sun King to raise long-term local currency debt by converting future customer repayments for financed solar products into investable assets.

[5] "$156M Sun King Securitization to Deliver Solar for Over a Million Kenyans" (July 28, 2025), Citi (website), https://www.citigroup.com/global/news/press-release/2025/citi-sun-king-securitization-deliver-solar-million-kenyans.

Supporting U.S. Affordable Housing

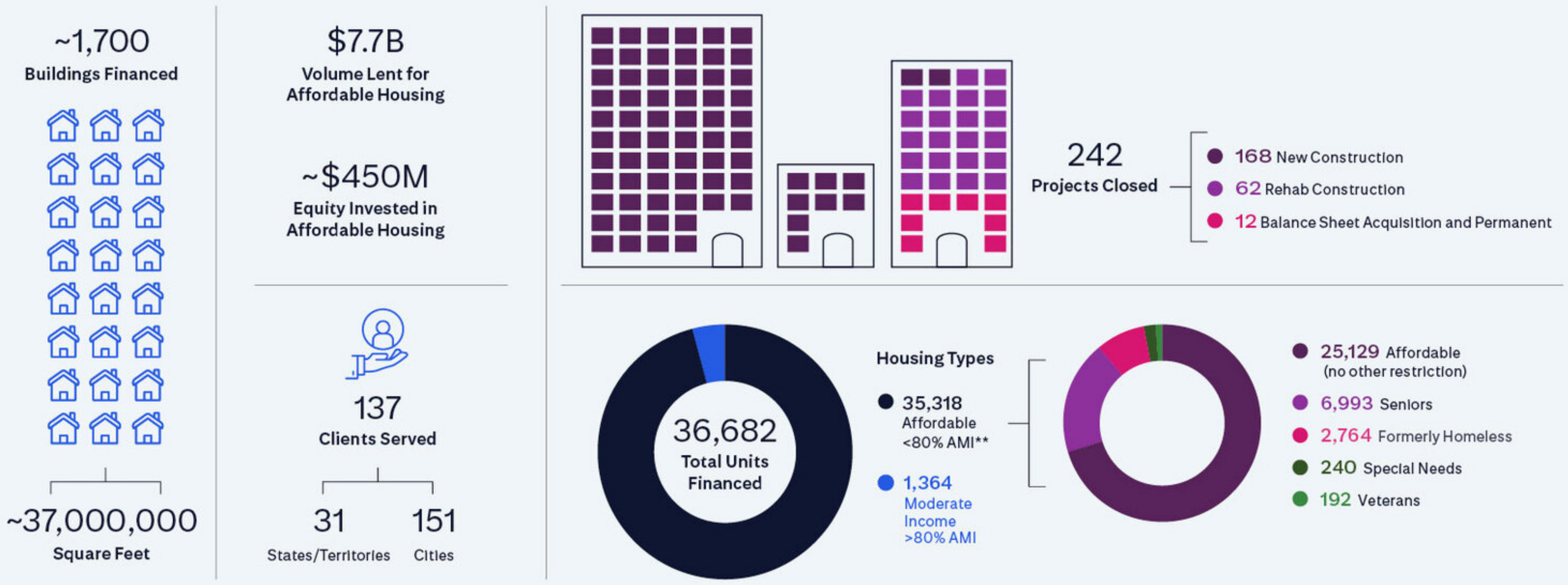
We focus on financing affordable housing for residents in urban and suburban areas with low and moderate income. We offer a range of finance solutions to help affordable housing developers construct, rehabilitate, refinance and acquire affordable multifamily housing across the country.

Citi Community Capital, the bank unit through which we finance all types of U.S. affordable housing* and community development projects, reported approximately $7.7 billion of lending to finance affordable rental housing projects in 2025.

For 16 consecutive years, Citi has been the #1 affordable housing lender in the U.S., as reported in Affordable Housing Finance magazine.

2025 U.S. Affordable Housing Impact

U.S. Affordable Housing Financed Through Citi Community Capital



Note: Figures may not sum to totals, due to rounding.
* Citi's affordable housing efforts in the U.S. are focused on housing designated for individuals with annual income below 80% of the area's median family income, as defined by the Federal Financial Institutions Examination Council (FFIEC).
** AMI = Area Median Income

Providing Affordable Housing for Seniors in New York City

OUR ROLE: LENDER

The Ridge Street Apartments will add 190 green residential units — including 30% reserved for formerly homeless seniors — paired with on-site support services.

Citi provided a $106 million construction loan to Catholic Homes of New York and co-developer Grand Street Guild to finance The Ridge Street Apartments, 100% of which will be dedicated to affordable housing for seniors.[6] When completed, the structure's 190 apartments will be rented to tenants who are 62 or older, with 30% reserved for formerly homeless seniors. Amenities include more than 9,700 square feet of community facility space, and Catholic Charities Community Services will deliver a full range of services. The project is designed to meet Passive House and Enterprise Green Communities standards, with long-term operating efficiency and sustainability as a priority.

[6] "Ridge Street Apartments Secures Financing At 145 Broome Street on Manhattan's Lower East Side" (July 17, 2025), New York YIMBY, https://newyorkyimby.com/2025/07/ridge-street-apartments-secures-financing-at-145-broome-street-on-manhattans-lower-east-side.html.

Our $1 Trillion Goal

We set a goal in 2020 to finance and facilitate $1 trillion in sustainable finance by 2030 to support the growth of scalable financial solutions to help address environmental and social challenges.

Now more than halfway toward our goal, we have counted $647.2 billion toward our $1 Trillion Sustainable Finance Goal. While our 2025 results reflect a challenging market, we remain focused on capturing new business and driving progress toward the goal in the second half of the decade. Citi businesses, including Services, Markets and Banking, are contributing to this goal with products and services that can support sustainable finance, including financing and advisory services to help companies achieve their sustainability strategies; issue green, social and sustainability bonds; implement sustainable supply chain finance programs; and access sustainability-linked lending. For more information about our businesses, see Sustainability at Citi.

Tracking Our Progress

In line with our efforts to provide transparency, we released the Sustainable Finance Framework in 2025, outlining our approach and methodology to classify activity as sustainable finance for the purpose of tracking and disclosing progress toward our $1 Trillion Sustainable Finance Goal. The new Sustainable Finance Framework details the updated eligibility criteria for the $1 Trillion Goal, which now includes areas like nuclear energy and nature-based solutions. For activity to be counted toward the $1 Trillion Goal, it must meet at least one of the sustainable finance criteria, which are informed by evolving external standards.

We track our sustainable finance activities using third-party financial league table credit, where applicable. The industry league tables track public financial activities and rank financial institutions based on their role (e.g., lead arranger, bookrunner) in each transaction.

For financial products or activities for which there are no league tables, we count the amount that reflects our firm's financial involvement in the deal. An eligible transaction may meet multiple criteria; however, for purposes of tracking progress toward the $1 Trillion Sustainable Finance Goal, it will only be counted once. More information on how we track progress toward the goal can be found in the Sustainable Finance Framework. Beyond counting the dollar amount, we also calculate the estimated impacts associated with a subset of activities, where feasible.

Our Banking business continued to be the largest contributor toward the $1 Trillion Sustainable Finance Goal, with prominent mergers and acquisitions and debt capital markets deals throughout the year. Renewable energy and sustainable transportation projects made up the largest share.

$1 Trillion in Sustainable Finance by 2030

Our $1 Trillion Sustainable Finance Goal aims to support the transition to a sustainable, low-carbon economy that takes into consideration society's environmental, social and economic needs. We intend to meet this goal through a combination of environmental and social finance activities, building on a history of setting successful goals focused on business opportunities.

Sustainable Finance Goal Progress Toward $1 Trillion Goal*

Environmental Criteria for $1 Trillion Goal*

- Circular Economy
- Clean Technology and Climate Resilience
- Energy Efficiency
- Sustainable Transportation
- Green Buildings
- Renewable Energy
- Sustainable Agriculture, Land Use and Biodiversity
- Water Quality and Conservation

Social Criteria for $1 Trillion Goal*

- Affordable Basic Infrastructure
- Affordable Housing
- Healthcare
- Economic Inclusion
- Education
- Food Security

Measuring the Estimated Impact of Our Sustainable Finance Goal

We take a conservative approach to estimating impacts, only including deal activity for which suitable methodologies and data sources are available, and excluding deals for which we have limited transparency and details. We consider impact measurement an area of ongoing education and improvement. See page 16 for a summary of our impact measurement methodology.

We estimate that since 2020, activity related to the sustainable financing we provide has resulted in:

67M+
people impacted worldwide

4.4M+
jobs supported

8.8M
metric tons of GHG emissions avoided as a result of our renewable energy, green affordable housing and energy efficiency financing activities

See our detailed goal data

* An eligible transaction may meet multiple criteria but is only counted once toward the $1 Trillion Sustainable Finance Goal.

Our $1 Trillion Goal in Action

The following are examples of finance transactions from 2025 that contributed to the $1 Trillion Sustainable Finance Goal. The icons indicate which goal criteria each project supports, using the key on page 12.

Clean Technology and Climate Resilience | Renewable Energy

Scaling Renewable Energy Storage in Bulgaria

OUR ROLE: LENDER

Installation of the 124-megawatt (MW) battery energy storage system (BESS) supports Bulgaria's efforts toward a stable, solar-powered grid with predictable energy prices.[7]

Advance Green Energy AD, based in Bulgaria, developed and constructed the BESS, sited alongside a 106-MW photovoltaic plant in Lovech's Balkan Industrial Park. The developer secured 61.2 million euro, including a loan from Citi, to fund the 75 million euro project, with the remaining investment covered by a 29.6 million euro EU subsidy. Proceeds of the loan are for the construction and completion of a BESS project in Bulgaria, which, according to the Bulgarian Ministry of Energy, was the largest operational battery storage facility in the EU by total energy capacity at the time of its May 2025 inauguration.[8] By storing off-peak solar energy and releasing it during peak demand hours, the facility will contribute to grid and energy-price stability in Bulgaria.

Healthcare

Making Health Care Accessible for Rural Seniors in U.S.

OUR ROLE: IMPACT INVESTOR

Hopscotch Primary Care is working to deliver primary care across the U.S., with a focus on expanding access to high-quality care for Medicare and Medicaid/Medicare patients in rural areas.

Hopscotch Primary Care leads independent primary care practices working to transform health care in rural communities and small towns across the U.S. Powered by dedicated care teams and an innovative suite of technology, Hopscotch provides reliable access to high-quality care, a trusted relationship between patient and provider, and support that extends beyond the clinic walls. The Citi Impact Fund, which invests in U.S.-based companies developing innovative solutions to address community challenges, made a direct equity investment in Hopscotch in 2024 and a follow-on investment in 2025.

Economic Inclusion

Promoting Economic Inclusion in India

OUR ROLE: LENDER, LEAD ARRANGER AND COORDINATOR

Citi financing will support smallholder farmers, who often have limited access to affordable capital but who are critical to India's food security and rural economy.

In partnership with the German development finance institution DEG, Citi arranged a $76 million co-financing package for Shriram Finance Ltd. to support economic inclusion, rural development and sustainable transportation across India.[9] Shriram is a non-banking financial company specializing in asset financing in India to expand economic inclusion for underserved micro and small enterprises (MSMEs), women and farmers in rural and semi-rural India. The blended financing enables access to financing, including some electric vehicle financing. In total, Citi, DEG and Shriram supported on-lending to 6,910 households, including 803 women, as of March 2026.

[7] "Largest battery storage system in Balkans commissioned in Bulgaria" (May 26, 2025), Balkan Green Energy News, https://balkangreenenergynews.com/largest-battery-storage-system-in-balkans-commissioned-in-bulgaria.
[8] "Bulgaria launches EU's largest battery storage system" (May 26, 2025), Green Forum, https://www.green-forum.eu/energy/20250526/bulgaria-launches-eus-largest-battery-storage-system-1890.
[9] "German DEG, Citi to provide $76 million funding to Shriram Finance" (March 4, 2026), Business Standard, https://www.business-standard.com/companies/news/german-deg-citi-provide-usd-76-million-fund-shriram-finance-126030400664_1.html.

$1 Trillion Sustainable Finance Goal

Financial Data[1]

In billions USD

Business	2025	%	Total	Total %
Banking	$67.5	74%	$560.0	87%
Investment Banking	$65.7	72%	$543.0	84%
Mergers and Acquisitions	$21.1	23%	$181.8	28%
Debt Capital Markets	$43.8	48%	$307.1	48%
Dedicated Purpose — Use of Proceeds	$32.2	35%	$198.6	31%
Thematic Bonds	$29.5	32%	$189.3	29%
Green and Other Loans	$1.8	2%	$6.4	1%
Infrastructure Finance Underwriting	$0.9	1%	$2.9	0.4%
General Purpose — Sustainability-Linked	$11.6	13%	$108.6	17%
Sustainability-Linked Bonds	$0.9	1%	$12.0	2%
Sustainability-Linked Loans	$10.7	12%	$96.6	15%
Equity Capital Markets	$0.6	1%	$11.7	2%
Legacy-Businesses — Municipal Underwriting[2]	$0.1	0.1%	$42.3	7%
Corporate Lending[3]	$1.8	2%	$17.0	3%
Services[4]	$10.9	12%	$28.7	4%
Markets[5]	$11.8	13%	$56.5	9%
Corporate/Other (Citi Investments)	$1.2	1%	$2.0	0.3%
Total	**$91.3**	**100%**	**$647.2**	**100%**

[1] Figures may not sum to totals due to rounding.
[2] Citi exited the municipal underwriting business in 2024.
[3] Several businesses that were historically reported under Corporate Lending now roll up to Markets due to product alignment, including Financing & Securitization businesses such as Citi Community Capital (our U.S. Community Capital/affordable housing lending business), Asset-Backed Securitization and Financing, and Clean Energy Finance.
[4] "Services" includes, but is not limited to, export agency financing, trade and working capital lending, and trade payable financing.
[5] "Markets" includes, but is not limited to, commodities transactions that meet renewable energy criteria and other fixed income transactions such as private placement of green bonds, notes or repurchase agreements.

Sustainable Finance Criteria	2025	%	Total	Total %
Total Environmental	**$35.1**	**38%**	**$272.1**	**42%**
Circular Economy	$1.8	2%	$27.1	4%
Clean Technology and Climate Resilience	$0.7	1%	$5.9	1%
Energy Efficiency	$0	0%	$7.3	1%
Green Buildings	$0.6	1%	$21.9	3%
Renewable Energy	$18.4	20%	$90.1	14%
Sustainable Agriculture, Land Use and Biodiversity	$0	0%	$0.7	0.1%
Sustainable Transportation	$10.3	11%	$94.5	15%
Water Quality and Conservation	$0.1	0%	$7.8	1%
Multiple Environmental[6]	$3.2	4%	$16.9	3%
Total Social	**$8.0**	**9%**	**$83.5**	**13%**
Affordable Basic Infrastructure	$0.2	0.2%	$1.7	0.3%
Affordable Housing[7]	$6.2	7%	$47.6	7%
Economic Inclusion	$1.1	1%	$14.2	2%
Education	$0	0%	$9.3	1%
Food Security	$0.3	0.3%	$1.5	0.2%
Healthcare	$0.3	0.4%	$8.0	1%
Multiple Social[6]	$0	0%	$1.1	0.2%
Multiple Environmental and Social	$0.7	1%	$6.0	1%
Framework-Based[8]	$36.5	40%	$174.1	27%
KPI-Linked[9]	$11.1	12%	$111.5	17%
Total	**$91.3**	**100%**	**$647.2**	**100%**

Geographies[10]	2025	%	Total	Total %
North America	$34.7	38%	$283.3	44%
International	$56.6	62%	$363.8	56%
Total	**$91.3**	**100%**	**$647.2**	**100%**

[6] Denotes activities that may meet multiple environmental and/or social criteria.
[7] "Affordable Housing" includes, but is not limited to, projects financed through Citi Community Capital.
[8] Denotes transactions where the use of proceeds aligns with the client's framework.
[9] Denotes activities linked to an environmental and/or social key performance indicator.
[10] This data table is organized to show our simplified geographic management structure. Geographies outside of North America (U.S. and Canada) are consolidated under International.

$1 Trillion Sustainable Finance Goal

Impact Data[11]

Citi works to estimate the environmental and social impacts associated with clients' projects and transactions contributing to the $1 Trillion Sustainable Finance Goal, where feasible. Using client-provided data that is not independently verified, we report impacts based on our financed share of the transaction. Additional details on our methodology are on page 16.

Estimated Environmental Impacts (in thousands)	2025	Total
Avoided greenhouse gas emissions (mt CO_2e)	325	8,808
From renewable energy projects	304	8,205
From green buildings, energy efficiency and transit projects	22	603
Renewable energy production and storage capacity added (MW)	0.3	7
From renewable energy storage projects	0.2	6
From battery storage projects	0.1	0.5

Estimated Social Impacts (in thousands)	2025	Total
Total people impacted	1,694	67,450
From microfinance lending, basic infrastructure, basic digital device, education and other social purposes[12, 13]	1,179	13,204
Through renewable energy projects	310	7,352
Through international transit projects	160	160
From affordable housing projects	45	481
From education, transit system, utility improvement and economic development projects financed by U.S. municipal bonds	0	46,253
Total jobs supported	578	4,499
From microfinance lending, basic infrastructure, basic digital device, education and other social purposes[12, 13]	541	4,090
Through renewable energy projects	2	37
Through green building projects	6	36
Through international transit projects	5	5
From affordable housing projects[14, 15]	25	285
From education, transit system, utility improvement and economic development projects financed by U.S. municipal bonds	0	47

[11] Figures may not sum to totals due to rounding.
[12] For microfinance lending, basic infrastructure, home solar systems and other social purposes, the number of people impacted typically equals the total number of jobs supported where data was sufficient.
[13] "Other social purposes" includes provision of cellphones, clean carbon cookstoves and access to telecoms or other basic services.
[14] Jobs supported through green building projects include those from affordable housing projects financed through Citi Community Capital.
[15] Jobs relating to municipal affordable housing bonds, including financial counseling, are reported under total jobs supported from affordable housing projects.

Impact Calculation Methodology Summary

For financed or facilitated activities where it was not feasible to estimate impact due to limited data availability, or because suitable methodologies are not available, impacts have not been included. To estimate the environmental and social impacts of our clients' activities arising from Citi-financed and -facilitated projects and activities, we considered the following metrics:

Avoided greenhouse gas (GHG) emissions are the amount of GHG emissions avoided because of our share of financing for relevant projects: renewable energy, energy efficiency improvements and green buildings. In each case, avoided emissions are proportional to Citi's financed share of total project cost and reflect the per annum benefit rather than the benefit over the entire project life. The approach and calculations broadly align with the Partnership for Carbon Accounting Financials (PCAF) guidance on GHG accounting and reporting of avoided emissions of financed projects.

- Renewable energy projects: Project capacity is multiplied by the annual capacity factor for the relevant renewable technology, then multiplied by the regional GHG emissions factor to calculate the GHG emissions avoided from renewable energy generation.
- Energy efficiency and transit projects: Average household energy use per unit (MWh) is multiplied by the number of units and the percentage of energy savings associated with the relevant energy efficiency certification. The result is multiplied by the regional GHG emissions factor to estimate emissions avoided from efficiency upgrades. For some transit projects, the basis for GHG emissions avoided is from a study conducted by Citi.
- Green buildings: Annual energy savings for each project are calculated using electricity energy intensity factors by building size, multiplied by the project square footage and energy savings percentage (i.e., the average energy use of a non-green building-certified baseline such as LEED, EDGE or equivalent certifications). The result is multiplied by the regional GHG emissions factor to calculate avoided GHG emissions.

Renewable energy production and storage capacity refers to new renewable energy capacity and new battery storage capacity installed as a result of Citi's proportional share of renewable energy project financing.

People impacted refers to an estimated number of people who directly benefit from the use of Citi-financed lending activities or underwritten financing proceeds. This includes families benefiting from affordable housing or renewable energy generation, entrepreneurs and smallholder farmers receiving business loans and children benefiting from new or repaired school buildings. Citi's process for measuring and reporting social impacts is consistent with the Global Impact Investing Network (GIIN) IRIS+ system for measuring social impact. IRIS+ outlines measures and a process for estimating the impact of investments.

- For microfinance, smallholder farmer, basic digital device and other social purpose lending activities in emerging markets, people impacted is equivalent to the number of entrepreneurs, small farm holders and individuals receiving loans as self-reported by Citi clients and proportional to our share of financing. For larger telecoms providing access to households, people impacted refers to households enabled with digital access or access to mobile phones by the client in the country supported by Citi financing, as self-reported by the client. For larger water treatment projects, people impacted refers to the number of households benefiting from the construction of new utilities as self-reported by Citi clients. For home solar and renewable energy projects, people impacted refers to the number of households benefiting from access to renewable energy as self-reported by Citi clients.
- For renewable energy projects and energy efficiency finance, people impacted is equivalent to the number of people whose annual energy usage is supplied by the project. Estimated renewable energy generation annually due to Citi financing is divided by average energy consumption per capita in the country of the project, to estimate the number of people impacted.
- For transit, the number of people impacted is calculated as the total number of rides in a year divided by the average number of rides per passenger, to estimate the total number of unique passengers affected.
- For affordable housing, the number of people impacted is calculated using external reference data on average household size, multiplied by the number of housing units constructed.

Jobs supported refers to the number of jobs supported by the uses of Citi-financed lending or underwritten municipal bond proceeds. Jobs supported are related to the bank's share of new financing for the projects. For microfinance lending, jobs supported is equal to the number of entrepreneurs and smallholder farmers that received loans. For projects involving new construction, maintenance or repair of affordable housing units, or renewable energy generation in the U.S., jobs supported is calculated as Citi-financed expenditures divided by output per worker, supplied by industry-level economic data accessed from the IMPLAN input-output modeling system for the U.S., which is built on U.S. Bureau of Economic Analysis (BEA) and U.S. Bureau of Labor Statistics (BLS) data.[16] For projects involving renewable energy generation and transit in locations outside the U.S., external data is used to estimate the share of project cost attributable to installation labor. This amount is then divided by average worker compensation in the relevant country to estimate the number of jobs supported. This approach uses input-output economic modeling of relevant geographies to estimate jobs supported.

[16] Relevant IMPLAN industries include (1) electric power generation – solar, (2) electric power generation – wind, (3) construction of new multifamily residential structures and (4) construction of new power and communication structures.

Environmental Impact and Climate Risk

Our Net Zero Commitment

Citi has committed to achieving net zero greenhouse gas (GHG) emissions for our financing activities by 2050 and for our direct global operations by 2030.

Our net zero commitment for financing activity and related interim 2030 targets help us track decarbonization and transition within our portfolios, and support engagement with our clients on emerging industry trends. Although the global energy transition is progressing unevenly across geographies and regulatory environments, demand for decarbonization and transparency continues. Many organizations are embedding decarbonization to a greater extent into their strategic planning, driven by the complex interplay of regulatory pressures, financial incentives and the need for increased resilience and adaptation measures in response to extreme weather. In addition, geopolitical conflicts and volatility in the energy markets are causing organizations to seek alternative technologies to help ensure a consistent and secure energy supply.

Citi continues to engage with clients, as appropriate, to better understand climate risk and transition profiles and to identify areas where we can provide support. For more information, see our 2024 Climate Report.

Since 2021, when we announced our commitment to achieve net zero financed emissions by 2050, we have established 2030 interim emissions reduction targets for 10 sectors within our portfolio that include some of the most carbon-intensive sectors in the global economy. See our 2024 Climate Report for baseline data and progress against interim targets and our Net Zero Metrics Methodology document, which outlines our metric calculation methodologies. Where possible, emissions metrics are calculated consistent with relevant standards, including the Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Standard and the Partnership for Carbon Accounting Financials (PCAF) Standard.

We have also established a number of initiatives and programs to help us deliver on our 2030 net zero operational emissions commitment, which consists of Scope 1 and 2 (market-based) emissions[1] for owned and leased facilities, corporate aviation and vehicles. We have focused our operational emissions reduction efforts on these areas because we have more direct control over them than other upstream value chain activities. Learn more about these efforts in Sustainable Operations. To assess and support progress on this commitment, we monitor and report annually on market-based Scope 1 and 2 GHG emissions; see selected metrics.

Our Approach to Managing Climate Risk

Our Risk Management function is responsible for identifying, measuring, monitoring, controlling and reporting risks to the company. Citi continues to view climate risk as a cross-cutting risk that can manifest in each of the risk categories in our risk taxonomy, such as Credit, Market and Operational. Our Climate Risk Management Framework (CRMF) operates within our broader Enterprise Risk Management Framework and promotes a globally consistent approach to managing climate risk across Citi. For details about our climate governance structure and the CRMF, see our 2024 Climate Report.

As one of the largest financiers of the global economy, Citi is exposed to numerous climate risks. This means that as we address and mitigate risks, we must consider how we will protect and strengthen our business while navigating the global energy transition.

[1] Not inclusive of fugitive emissions.

Reducing Climate Risk in Our Financing

We aim to understand the transition and physical risks that we and our clients are exposed to by measuring the GHG emissions associated with our financing portfolio and evaluating portfolio decarbonization pathways for applicable sectors, as noted in our 2024 Climate Report.

In addition, we continue to make progress toward embedding climate-related considerations into our overarching risk management approach which is driven by the materiality of financial and strategic risk considerations. This includes enhancing methodologies for quantifying how climate risks could impact the individual credit profiles of our clients. It also involves performing climate risk scenario analysis, including stress testing, to assess the potential impact of climate-related risk drivers on our risk profile across a range of plausible climate-related scenarios.

Managing Climate Risk in Our Operations

Because Citi operates at sites around the world, our facilities could potentially be exposed to a range of climate-related risks. To increase our resiliency, we have invested in climate risk management solutions in a number of critical facilities.

Our Crisis Management, Business Continuity and Real Estate Services (RES) teams help us monitor, prepare for and respond to extreme weather events or other disruptions to our operations. For example, our RES team conducts due diligence for each proposed new location and reassesses the properties' structural resilience periodically, as well as following significant events. These assessments take into account internal Citi standards and local codes.

In addition, Citi undertakes a formal process to assess the resilience of the full range of our critical business services in the face of potential risks, including climate-related risks. We also conduct exercises to assess our ability to transfer critical business services from one location to another in the wake of events that could interrupt regular business activity, including those caused by climate change.

Our Operational Risk Management (ORM) team has updated the Operational Scenario Analysis procedure to include climate-related operational risk scenarios. Climate risk has also been integrated into ORM processes, including the use of third-party risk metrics, which assist in measuring business resilience.

Employee Training and Engagement

We provide training and engagement opportunities to further our colleagues' understanding of climate-related issues and other environmental concerns, as we strive to run a sustainable business and provide responsible financing.

The Citi Sustainability Learning Center, available to all Citi colleagues, includes introductory and advanced on-demand courses on energy, sustainable finance, environmental and social risk management, our sustainability-related commitments and other topics.

Our Citi Green Champions continue to drive sustainability awareness and engagement at our offices around the world. In 2025, we expanded this program from 39 to 48 groups, and we established the first three groups in Africa at our offices in Douala, Cameroon; Lagos, Nigeria; and Kampala, Uganda.

In recognition of Earth Day, Citi Green Champions organized waterway cleanups, collected gently used clothes for donation and hosted activities to educate colleagues on composting and recycling. Citi Green Champions also engaged colleagues globally in recognition of the International Day of Awareness on Food Loss and Waste Reduction by sharing innovative recipes to reduce food waste.

In addition, our Citi Green Champions organize location-specific activities throughout the year. Following are several examples from 2025:

- **Dublin, Ireland:** Led colleagues in a beach cleanup event to prevent plastics and trash from entering local waterways.
- **Heredia, Costa Rica:** Hosted a workshop to create art out of recycled materials, to educate colleagues about waste reduction.
- **New York City:** Hosted three garden-to-table cooking workshops with professional chefs, featuring recipes using local and seasonal produce.
- **Pune, India:** Repurposed leftover fabric to make children's plush toys and created bird nests from coconut husks to support local wildlife habitat.

Sustainable Operations

Citi has been measuring, reporting on and working to reduce the impact of our global operations for more than two decades, and we have a history of prioritizing healthy facilities for our customers and colleagues.

Operational Footprint Goals

We began tracking data related to energy, water and waste for our first sustainability report in 2000. Since 2007, we have established successive sets of operational footprint goals and reported progress against them. At the end of 2025, we closed out our fourth generation of goals, which have helped drive performance improvements related to GHG emissions, energy, water, waste and sustainable building design.

We made progress in all five categories of our 2025 goal set, achieving six out of eight goals. In the categories of water and waste, we succeeded in meeting goals related to reducing water consumption and total waste. However, we did not meet our goals related to the use of water from reclaimed/reused sources and waste diversion. We were unable to achieve our 2025 water reclamation goal due primarily to limited on-site infrastructure, the complexity of retrofitting systems and the lack

2025 Operational Footprint Goals*

The table below details our final progress report for our 2025 Operational Footprint Goals, measured against a 2010 baseline. As of the end of 2025, we had achieved six out of eight goals across all five categories.

★ Indicates goal achievement

Category	Goals		Progress Through 2025	Highlighted Activities and Initiatives, 2021–2025	
GHG Emissions	45%	reduction in location-based GHG emissions**	★ 58%	• Developed a decarbonization approach for real estate location-based emissions, which included a program to install on-site solar generation as feasible and to retrofit our facilities with more efficient lighting, HVAC systems and other site-specific improvements	• Established a "zero-carbon-ready" approach for new buildings and renovations • Consolidated our real estate portfolio to increase the efficiency of our footprint • Adopted hydrotreated vegetable oil as an alternative to diesel fuel at various sites
Energy	40%	reduction in energy consumption	★ 43%	• Installed on-site renewables at 17 locations with plans to expand to additional locations • Installed batteries in select areas to store excess renewable energy generation	• Developed energy efficiency approaches and programs for new and renovated facilities, including heat pumps, window upgrades and improved building systems controls
	100%	maintain 100% renewable electricity sourcing	★ 100%†		
Water	30%	reduction in total water consumption	★ 43%	• Installed efficient water fixtures in many new and retrofitted building interiors • Installed gray water and rainwater capture systems	• Sourced reclaimed water from local utilities
	25%	of water consumed to come from reclaimed/reused sources	11%		
Waste	50%	reduction in total waste	★ 68%	• Established composting programs for food and other organic materials at several facilities • Donated furniture and other retired office assets to various organizations, including schools and nonprofits • Increased recycling at our bank branches	• Replaced single-use plastics for staff dining, hospitality and vending with sustainable alternatives at certain facilities • Installed refillable water bottle stations at multiple facilities
	50%	of waste diverted from landfill	49%		
Sustainable Buildings	40%	of floor area to be LEED-, WELL- or equivalent certified	★ 64%††	• Enrolled in WELL rating and benchmarking programs, in addition to seeking WELL certification at select locations to prioritize employee and customer health in our buildings	• Participated in the LEED Volume Program and earned 302 sustainable building certifications through LEED, WELL or other equivalent standards

* These goals include the environmental impact of our offices, facilities and branches.
** This includes location-based Scope 1 and 2 GHG emissions.
† 96% within market boundary criteria; 4% sourced from regionally aligned markets.
†† Total includes Leadership in Energy and Environmental Design (LEED), WELL Building Standard and Excellence in Design for Greater Efficiencies (EDGE) projects.
For operational footprint data, see Environmental Metrics for Operations at the end of this section.

of reclaimed water sourced through local utilities. For our waste diversion goal, challenges included limited availability of data and lack of recycling infrastructure in many of the countries where we operate. These areas remain a priority for Citi, and we will continue to make efforts to address these challenges.

2030 Operational Footprint Goals

Beginning in 2026, we will measure progress against our fifth generation of operational footprint goals, which we aim to achieve by 2030. We are expanding the scope of these goals to include revised boundaries and baselines.

Our 2030 goals will continue to prioritize improved performance in the areas we have been measuring and reporting on for many years, including location-based GHG emissions and energy goals that help us deliver on our commitment to 2030 net zero operational emissions:

- 15% reduction in location-based GHG emissions by 2030 (measured against a 2025 baseline)
- 10% reduction in energy consumption by 2030 (measured against a 2025 baseline)

As technology, energy systems and market conditions continue to evolve rapidly, we are evaluating pathways to achieve our new goals. We are also considering additional goals, which we expect to announce separately in future reporting.

GHG Emissions Reduction

We work to reduce GHG emissions through energy efficiency efforts and by implementing clean energy innovations. Our "zero-carbon-ready" building approach for new and remodeled facilities seeks to address operational and embodied carbon emissions, inclusive of energy use, energy supply, integration with utilities and material use. In 2025, we implemented this approach for retrofits of offices and data centers across North America and for new building projects in Chennai and Pune, India.

In addition, two ongoing projects — a major renovation of our London office and a new facility in Dublin — are aligned with our "zero-carbon-ready" building approach, and we intend to pursue BREEAM, LEED and WELL certifications in London and LEED, WELL and Zero Carbon certifications in Dublin.

Our Approach to Carbon Credits

We have been purchasing voluntary third-party-verified carbon credits since 2022. These consist of a portfolio of nature-based, energy efficiency and methane destruction credits in an amount equivalent to our Scope 1 emissions.[2] We seek to purchase high-integrity voluntary carbon credits, prioritizing removal credits, which help support biodiversity and local communities, as well as helping us compensate for operational greenhouse gas emissions. However, to drive absolute emissions reductions, we did not account for the use of carbon credits when measuring progress toward our 2025 operational footprint goals. These credits have been accounted for in our Environmental Metrics for Operations. For more information on the underlying credits, see the related table at the end of this section.

[2] Not inclusive of fugitive emissions.

Investing in Renewable Energy

Since 2020, Citi has sourced 100% renewable electricity for our operations, which is one of our operational goals and helps us meet our net zero commitment for our operations.

As availability of renewable electricity can be limited in some areas of the world, we prioritize on-site generation of renewable electricity where possible, followed by sourcing within the same market boundary as our facilities. When neither of these options is practical, we source renewable electricity from nearby markets instead, aiming to move toward additional local sourcing or on-site generation as it becomes feasible.

In 2025, Citi installed solar panels and expanded current solar generation capacity for a number of our owned and leased sites, including in Belfast, Northern Ireland; Hong Kong; Libreville, Gabon; London; and Tunis, Tunisia. At some of our facilities, we are piloting the use of batteries to store excess energy generated by solar panels.

Citi On-Site Solar Generation
(as of Year-End 2025)

17 owned or leased sites with active, on-site solar generation

1.8 megawatts of installed generation capacity

Reducing Water Use, Increasing Water Reclamation

Citi prioritizes water conservation and reclamation in building design. For example, we install efficient water fixtures to reduce overall water use. In addition, where possible, we incorporate systems to enable the use of reclaimed and reused water for our buildings and their landscaping. We also landscape with plants that require less water and are suited to the local climate.

We are continuing to source reclaimed water from local utilities, where available, and through other on-site reclamation systems such as rainwater harvesting and gray water[3] or wastewater treatment plants. Reclaimed water is treated to meet health and safety standards and reused for different purposes across our sites such as irrigation, flushing in restrooms and cooling towers.

Water Reclamation Highlights

Use of reclaimed water decreases our use of fresh (or "first use") water by millions of gallons annually. Highlights from 2025 include:

~85M
total gallons of reclaimed water used across global sites

~5M
gallons of water captured through on-site rainwater harvesting, supplying water to cooling towers and irrigation at the global headquarters public plaza in New York City*
(pictured below)

~700K
gallons of water captured in Belfast through rainwater harvesting, used for flushing in restrooms

* Our global headquarters in New York City has a rainwater collection system. When sufficient supply is available, we use that captured rainwater to irrigate plants in the public plaza we maintain at the base of the building.

Reducing and Diverting Waste

Citi strives to reduce our overall waste generation and divert any waste that is generated away from landfills, though we do face challenges related to the lack of recycling infrastructure in many of the countries where we operate. Examples from 2025 of our efforts in this area include the following:

Recycling and Refurbishment: We partner with a vendor that recycles or refurbishes e-waste across all of our data centers globally (340 metric tons in 2025), and we purchase refurbished technology for use in Citi offices when possible.

Composting: Across 13 of our large offices in North America, nearly 223 metric tons of compost were collected from food waste, compostable serveware in staff cafes, as well as landscape composting.

Waste Audits: Citi conducted waste audits at select sites in North America and Europe, and we are using this analysis to inform our approach to reducing and diverting waste throughout our facility portfolio.

[3] International Water Management Institute, Explainer: Types of Water (https://www.iwmi.org/news/types-of-water/).

Sustainable and Healthy Buildings

Prioritizing sustainable building design is an important factor in our progress toward our operational footprint goals. For example, Citi construction projects for new buildings or renovations follow sustainable building principles, in alignment with the requirements for LEED certification. We have been a member of the LEED volume program for our bank branches since 2005.

2025 ISO Certifications

Our office and data center co-location in Frankfurt, Germany, was the first site in our portfolio to achieve ISO 50001 certification — an international standard for energy management. We also obtained ISO 14001 certification for the implementation of the environmental management system at our Citigroup Centre office and Riverdale data center in London and at our Gateway offices in Belfast.

In addition, we seek certification from the International WELL Building Institute™ — a third-party-verified system that assesses buildings according to human-centric design elements, such as providing green spaces, ensuring light, acoustic and air quality, enabling accessibility and other considerations. In 2025, four Citi sites across Hong Kong and Mexico earned WELL certification. In addition, our Citi Tower in Hong Kong was re-certified at the Platinum level. We also continue participating in additional rating and benchmarking programs with WELL, such as the WELL Health-Safety Rating and WELL at Scale.

Efficient Travel

Citi relies on a variety of efficiency efforts to reduce the environmental impact of employee travel, covering both local commuting and more extensive business travel.

Commuting: We offer bike storage and bike racks at several facilities, and colleagues in New York have access to the Citi Bike® bike share program. We also have electric vehicle charging stations at our London facility. In addition, our hybrid work model helps to reduce employee commuting and the associated emissions.

Business Travel: We prioritize the use of video and web conferencing technologies when possible and take a variety of steps to reduce the environmental impact of travel. For example, we encourage colleagues to consider rail travel as an alternative to short-haul flights, when possible. We also offer electric vehicle rentals and ride shares as a reimbursable travel expense, and we are working to transition our corporate vehicle fleet to electric, hybrid and low-emission models, where infrastructure allows.

Sustainable Sourcing

Citi seeks information about our suppliers' sustainability practices and their ability to manage critical issues. We communicate our expectations through the following:

The Citi Requirements for Suppliers, available in 14 languages, lays out some of the obligations that suppliers must meet in the course of doing business with Citi and provides information on key Citi policies. We review and update these standards regularly to reflect changing standards, policies and best practices.

The Citi Statement of Supplier Principles outlines the firm's aspirational guidelines for supply chain sustainability and sets forth guiding principles we encourage our suppliers to adhere to.

We also expect suppliers to have awareness of and comply with local regulatory requirements — for example, and not limited to, the UK and Australia Modern Slavery Acts. For more information about our approach in the area of human rights, see the Human Rights section.

Sustainable Technology

In 2025, Citi continued to seek EPEAT-certified options for our servers, laptops, desktop computers, monitors and mobile phones. We estimate an energy savings of 79 million kWh and a GHG reduction of approximately 16,500 metric tons of carbon dioxide over the life cycle of these products.

Environmental Metrics for Operations

We measure Scope 1 and 2 GHG emissions following the guidance in the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) GHG Protocol: A Corporate Accounting and Reporting Standard (revised edition) and the guidance in the WRI/WBCSD GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard.

Reporting of Operational Climate Impacts

Citi calculates emissions using emission factors and residual mixes from international and domestic sources, such as the Environmental Protection Agency (EPA) and the Department for Environment, Food and Rural Affairs (DEFRA). Citi also uses global warming potentials (GWPs) from the Intergovernmental Panel on Climate Change's (IPCC) Fifth Assessment Report (AR5).

Citi uses the operational control approach to determine organizational boundaries. Under the operational control approach, Citi accounts for 100% of emissions from operations over which the firm or one of the firm's subsidiaries has full authority to introduce and implement operating policies. Emissions are calculated by multiplying the amount of fuel consumed, electricity purchased and cooling consumed by the appropriate emissions factors. Where actuals are not available, estimates are used and multiplied by the appropriate emission factors. Additionally, market-based metrics include renewable energy certificates and green tariffs.

Citi bases estimates and methodologies on historical experience, available information and various other assumptions that the firm believes to be reasonable. Emissions data presented is subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection of different but acceptable measurement techniques can result in materially different measurements. The precision of different measurement techniques may also vary.

Citi obtained limited assurance over 2025 Scope 1 and 2 GHG emissions marked with an*. Information has been prepared on a calendar year basis, consistent with Citi's financial reporting period. Refer to KPMG's Independent Accountants' Review Report.

Location- and Market-Based Scope 1 and 2 Emissions[1]

	2010	2023	2024	2025
Scope 1 CO_2e (mt)[2, 3, *]	**34,385**	**52,665**	**52,090**	**50,790**
Scope 1 CO_2e: Real Estate (mt)[3, 4, 5]	34,385	46,216	46,690	45,734
Scope 1 CO_2e: Transportation Fleet (mt)[4, 5]	N/A[6]	6,449	5,400	5,056
Scope 2 Location-Based CO_2e (mt)[4, 5, *]	**834,069**	**345,926**	**332,418**	**319,240**
Scope 2 Market-Based CO_2e (mt)[7, *]	**N/A**	**27,990**	**38,250**	**35,850**
Scope 1 and 2 GHG Emissions Location-Based CO_2e (mt)[4, 5, *]	**868,454**	**398,591**	**384,508**	**370,030**
Scope 1 and 2 GHG Emissions Market-Based CO_2e (mt)[7, *]	**N/A**	**80,655**	**90,340**	**86,640**
Carbon Credits CO_2e (mt)	—	46,582	52,090	50,790
Net CO_2e Market-Based (mt)	**—**	**34,073**	**38,250**	**35,850**
Out of Scope CO_2e (mt)[3]	—	179	223	6

Note: Figures may not sum to totals, due to rounding.
*2025 metric within the scope of KPMG's limited assurance.
[1] In December 2024, Citi completed the separation of Banamex. Citi determined that effective fiscal year 2025, it no longer has operational control, thus excluding Banamex from its environmental metrics and restating the prior years and base year figures accordingly. The restated figures (including base year) will not tie out to previously published reports and are not subject to KPMG's limited assurance.
[2] Only includes stationary combustion emissions associated with real estate operations (i.e., offices, branches and data centers) and mobile combustion emissions associated with the Citi transportation fleet. Citi has determined that fugitive Scope 1 emissions are immaterial and are not reported.
[3] Where Hydrotreated Vegetable Oil (HVO) is used per the classification of the GHG Protocol, these emissions are listed as Out of Scope.
[4] Historical data can vary from year to year, due to changes in operational control as a result of acquisitions and dispositions of businesses. Historical adjustments are not made as a result of organic growth or decline for businesses remaining under operational control.
[5] Buildings with operational control are Citi-managed only. The current Citi-managed status has been applied to the current reporting year and all years back to baseline.
[6] Citi did not measure Scope 1 mobile combustion emissions associated with the transportation fleet when determining the 2010 base year.
[7] All Renewable Energy Certificates (RECs) and offsets obtained meet the requisite Scope 2 quality criteria.

Scope 3 — Category 6: Business Travel Emissions[8]

	2023	2024	2025
Business Travel — Air CO_2e (mt)	74,942	69,387	55,359
Business Travel — Train CO_2e (mt)	117	81	76
Total Scope 3 — Category 6: Business Travel CO_2e (mt)	**75,059**	**69,468**	**55,435**

Energy[8]

	2010	2023	2024	2025
Direct Energy (MWh)	**157,821**	**228,832**	**231,048**	**228,736**
Natural Gas (MWh)	114,076	209,796	205,231	211,251
Liquefied Petroleum (LP) Gas (MWh)	0	109	103	31
Fuel Oil (MWh)	43,745	20	45	28
Diesel (MWh)	—	17,424	23,015	15,016
Hydrotreated Vegetable Oil (HVO) (MWh)	—	703	875	22
Self-Generated Renewables (MWh)	—	780	1,779	2,390
Indirect Energy (MWh)	**1,741,059**	**922,900**	**882,005**	**853,742**
Total Purchased Electricity (MWh)	1,677,905	895,367	849,504	828,196
RECs[9]/EACs[10] (MWh)	—	683,751	639,731	641,396
PPA[11]/Source Contract (MWh)	—	179,381	173,133	150,716
Out-of-Market EACs (MWh)[12]	—	32,234	36,640	36,084
Purchased Steam and Chilled Water (MWh)	63,154	27,533	32,501	25,546
Total Direct and Indirect Energy (MWh)	**1,898,880**	**1,151,732**	**1,113,053**	**1,082,478**
% of Renewable Energy (MWh)[13]	**— %**	**78%**	**77%**	**77%**
% of Renewable Electricity (MWh)[14]	**— %**	**100%**	**100%**	**100%**

Note: Figures may not sum to totals, due to rounding.
[8] In fiscal year 2025, following the separation of Banamex, Citi no longer has operational control and has therefore excluded Banamex from all environmental metrics, with prior years and baselines restated.
[9] Defined as Renewable Energy Certificates.
[10] Defined as Energy Attribute Certificates.
[11] Defined as Power Purchase Agreement.
[12] Inclusive of residual mix.
[13] Calculated as the share of total direct and indirect energy that is sourced from low-carbon alternatives, including HVO, self-generated renewable energy, RECs/EACs and PPAs.
[14] Calculated as the share of total electricity consumption that is supplied by renewable sources, including self-generated renewable energy, RECs/EACs and PPAs.

Water and Waste Consumption — Global[15, 16]

	2010	2023	2024	2025
Waste Diverted from Landfill (mt)[17]	16,681	7,281	5,943	7,774
Refuse and Other (mt)	31,959	11,549	8,809	8,010
Total Waste (mt)	**48,640**	**18,830**	**14,752**	**15,784**
Potable Water (m^3)	5,080,371	2,808,883	2,605,659	2,584,731
Non-Potable Water (m^3)[18]	12,682	317,032	322,727	320,687
Total Water Consumption (m^3)	**5,093,052**	**3,125,915**	**2,928,386**	**2,905,418**

People and Building Characteristics — Global[15]

	2010	2023	2024	2025
Head Count[19]	233,011	161,420	146,703	196,953
Operational Square Footage	51,688,691	27,860,893	27,127,482	26,864,053

Total Energy Consumed[15]

	2010	2023	2024	2025
MWh/Operational Square Footage	0.04	0.04	0.04	0.04
MWh/Head Count[19]	8.00	7.00	8.00	5.00

Note: Figures may not sum to totals, due to rounding.
[15] In fiscal year 2025, following the separation of Banamex, Citi no longer has operational control and has therefore excluded Banamex from all environmental metrics, with prior years and baselines restated.
[16] Buildings with operational control are Citi-managed only. The current Citi-managed status has been applied to the current reporting year and all years back to baseline.
[17] Our landfill diversion rate quantifies the percentage of total waste that is diverted from landfill disposal through processes like recycling, composting, and incineration with energy recovery.
[18] Defined as water that is collected from rainwater capture systems, on-site sinks, groundwater wells sources and local municipalities then treated for reuse.
[19] Headcount is the number of occupants assigned to operating buildings for the purpose of occupancy and use monitoring. Citi has a large vendor population (i.e., facilities management employees, auditors, etc.) that occupies our office spaces and are not included in these metrics. Therefore, these values differ from global workforce data and the 10-K.

Building Certifications — Global[20, 21, 22]

WELL Silver	3
WELL Gold	1
WELL Platinum	7
LEED Certified	50
LEED Silver	58
LEED Gold	152
LEED Platinum	30
EDGE	1
Total	**302**

2025 Carbon Credits

Citi purchases voluntary third-party carbon credits in an amount equivalent to our Scope 1 emissions.

Supplier	Project Name	Credit Type	Project Type	Project ID	Registry	Protocol	Location	Independent Third-Party Verification[23]
Citigroup Energy, Inc	Advanced Refrigeration	Avoidance	Industrial Process Emissions	ACR0904	American Carbon Registry	Advanced Refrigeration Systems	South Carolina, United States	Y
Citigroup Energy, Inc	Grouped Projects for Vietnam Cookstove Program	Avoidance	Energy Demand	VCS2923	Verra	Energy Efficiency and Fuel Switch Measures in Thermal Applications	Vietnam	Y
Citigroup Energy, Inc	GreenTrees ACRE (Advanced Carbon Restored Ecosystem)	Removal	Forest Carbon	ACR0114	American Carbon Registry	Afforestation and Reforestation of Degraded Lands	Arkansas, United States	Y
Citigroup Energy, Inc	Reforestation of Degraded Lands in Sierra Leone	Removal	Forest Carbon	VCS2401	Verra	Afforestation, Reforestation, and Revegetation	Sierra Leone	Y
Citigroup Energy, Inc	Anew - Quinte Forestry Project	Removal	Forest Carbon	ACR0680	American Carbon Registry	Improved Forest Management	Ontario, Canada	Y
Citigroup Energy, Inc	ILTF/NICC & Blackfeet Nation Forest Carbon Project	Removal	Forest Carbon	ACR0782	American Carbon Registry	Improved Forest Management	Montana, United States	Y

[20] In fiscal year 2025, following the separation of Banamex, Citi no longer has operational control and has therefore excluded Banamex from all environmental metrics, with prior years and baselines restated.
[21] Total is based on active buildings in portfolio by year-end 2025 and excludes projects for inactive and disposed buildings.
[22] Includes buildings certified prior to 2020.
[23] Third-party verification reports can be found on the relevant registries.

Strengthening Communities

At Citi, we help expand economic opportunity and drive positive impact in communities where we do business. We are focused on advancing financial inclusion and supporting economic growth through small business and job development, workforce readiness and crisis response. In addition to our business-led engagements, Citi Community Investing and Development helps advance this work through equity investing and volunteerism, as well as through Citi Foundation philanthropy.

In 2025, we marked three major milestones across our community investing toolkit: five years for the Citi Impact Fund, 20 years for Citi Global Community Day and 30 years for the Citi Foundation.

Over the decades, the Citi Foundation has aimed to catalyze innovation by breaking down silos, incubating new ideas and scaling solutions that unlock opportunity. The Citi Foundation's philanthropy has helped community organizations reach individuals and families across more than 80 countries and territories. In addition, the Citi Foundation's "more than philanthropy" approach means that we also support grantees with the breadth and depth of Citi's expertise and people, to maximize their positive impact.

Complementing our philanthropy and other community investing efforts, we launched the Citi Impact Fund in 2020, to put our balance sheet to work by investing in "double bottom line" companies that are advancing community solutions across the U.S. As of December 2025, the Citi Impact Fund had invested in 56 companies and allocated over $200 million in capital.

In addition, Citi colleagues have a long tradition of giving back to our communities through volunteerism. From supporting the American Red Cross during World War I to responding to present-day community challenges, such as providing meals and building houses, our people have consistently shown up for those in need. In 2006, we held our first Global Community Day, starting an annual tradition of coming together across the world through volunteerism. This reinforces our strong culture of service and helps our teams build deeper relationships with our local communities and with each other.

To learn more about our financial inclusion efforts, see Financial Inclusion. For more about our work in affordable housing, see Supporting U.S. Affordable Housing.

Citi Impact Fund

The Citi Impact Fund is a $500 million fund that makes direct equity investments — from the bank's own balance sheet — into U.S.-based start-up companies that are developing innovative solutions to address community challenges. The Citi Impact Fund invests in companies and funds working across four focus areas: Financial Resilience, Social Infrastructure, Future of Work and Climate Resilience.

While applying rigorous investing standards, the Citi Impact Fund works with start-ups whose innovative products and services support economically vulnerable Americans. The Impact Fund is focused on catalyzing solutions with the potential to scale rapidly and address market gaps. Providing post-investment support through Citi resources and expertise remains a key pillar of the Citi Impact Fund's approach to helping companies accelerate their growth and impact, whether they aim to reach new markets, increase demand for their offerings or build long-term resilience.

Citi Impact Fund: Impact at a Glance

Portfolio Overview as of December 2025

56
companies and funds

$200M+
in capital allocated

2025 Investments and Value-Added Support*

Empathy
A platform that combines technology with human care to support people with the complex financial and emotional logistics of loss and legacy planning. Through partnerships with leading institutions, Empathy serves over 45 million policyholders and their families.

Cartwheel Care
A telehealth platform dedicated to improving mental wellness for K-12 students. Cartwheel Care served over 300 school districts in 2025.

Procurement Sciences
A leading AI platform for government contractors and businesses, helping cities and vendors navigate the procurement process more efficiently.

Rheaply
An end-to-end resource management platform helping businesses avoid waste by donating their surplus furniture and office supplies to community organizations. The Citi Real Estate Services team is a customer, partnering with Rheaply to donate furniture across several office locations. In 2025, we donated over $1 million in office furniture to nonprofit organizations through this collaboration.

* The data provided reflects the companies' self-reported information and, in some cases, is composed of the company's best-effort estimates.

Strategic Philanthropy: The Citi Foundation

Through strategic grantmaking, the Citi Foundation promotes economic progress in low-income communities around the world, focusing on programs that increase financial inclusion, catalyze job opportunities for youth and reimagine approaches to building economically vibrant communities. Read more about Citi Foundation initiatives here.

In 2025, the Citi Foundation provided over $53 million in grants. As a part of our approach, we continued sourcing grantees through open, program-specific requests for proposals (RFPs). This model enables us to engage and support a broad range of organizations across the globe.

Beyond funding, the Citi Foundation believes in the unique value of support for collaboration and capacity-building. Across several of our initiatives, we provide grantees with access to a learning community, including in-person and virtual opportunities to convene, learn from each other and form partnerships to strengthen their community impact. We provide technical assistance opportunities where grantees work with industry experts on topics like financial planning and revenue assessments to build organizational strength and capacity.

Crisis Response

Citi and the Citi Foundation support those affected by disasters and humanitarian crises across our footprint. Throughout 2025, we supported relief and recovery efforts around the world, including assistance for those navigating the aftermath of Hurricane Melissa in Jamaica, for those adversely affected by floods in Texas and for those affected by the storms and cyclones across Southeast Asia.

2025 Global Innovation Challenge: Accelerating Youth Employability

The Citi Foundation selected 50 community organizations around the world to receive a collective $25 million in funding as part of the 2025 Global Innovation Challenge to accelerate youth employability.

The Global Innovation Challenge provides catalytic funding to community organizations that are piloting or scaling innovative solutions to the social and economic challenges facing low-income communities globally. The 2025 Challenge is supporting a range of youth employability programs, from upskilling for digital and AI literacy in Hong Kong and providing vocational training for girls and young women in Kenya to enabling internships and job-shadowing in the retail sector in Romania, Ireland, Portugal and Hungary.

Grantees also have access to a learning community with opportunities to meet both in person and virtually, so they can share lessons learned and exchange best practices. This is the third iteration of the Global Innovation Challenge, building on the 2024 Challenge to address homelessness and the inaugural 2023 Challenge to expand food security.

Community Finance Initiative

The Citi Foundation announced the recipients of the second iteration of its Community Finance Initiative, granting a collective $15 million to 60 community organizations that are working to expand financial coaching and counseling efforts in low-income communities across the U.S. In addition to funding, this group of grantees has access to capacity-building support, including opportunities for financial education and coaching services for their own staff members.

Grantees in this cohort are providing critical financial counseling, guidance, education and action plans to help individuals, families and entrepreneurs address immediate financial challenges such as debt, credit repair or a household budget crisis. They also are providing longer-term financial coaching to help those they serve build saving habits, plan for future milestones and develop money management confidence.

Community Progress Makers

In 2024, the Citi Foundation announced the fourth cohort of Community Progress Makers, committing a collective $50 million in grants over three years to 50 community organizations that are working to connect low-income communities in the U.S. with greater economic opportunity. Areas of work include affordable housing and access, economic development, financial health and workforce readiness.

In 2025, the Citi Foundation hosted a series of in-person convenings for the fourth cohort, co-designed with grantees and aimed at fostering stronger connections, building organizational capabilities and facilitating shared learnings. The convenings took place in Greater Chicago, Greater New York City, Greater Washington, D.C., Northern and Southern California and South Florida. Grantees participated in interactive breakout sessions and expert-led panels, and collaborated to develop solutions to shared challenges.

Citi Volunteers Around the World

Throughout the year, Citi colleagues, alumni, partners, clients, family and friends give back to the communities where we live and work. Examples of some of our local efforts are detailed below.

Strengthening Financial Education in the U.S.

Citi colleagues visit classrooms and community centers across the U.S. to deliver financial education to students, young adults and older adults.

For more than 20 years, Citi volunteers have participated in the Teach Children to Save campaign, the U.S. banking industry's largest volunteer effort helping young people kick-start their financial futures. Citi participates in the national Get Smart About Credit campaign, and in 2025, activities included workshops on building credit, budgeting and saving, as well as introducing students to careers in financial services. Citi colleagues also engage in the Safe Banking for Seniors national campaign, providing older adults with resources to protect them against financial fraud and enhance their financial safety.

Supporting Women in Hong Kong

Citi colleagues in Hong Kong organized volunteer events with PathFinders Limited, an organization that supports migrant mothers and children, assembling maternity care packages of such essential supplies as diapers and toiletries.

Providing Meals in Poland

Citi colleagues in Poland collaborated with the Olsztyn Food Bank, an organization that collects surplus food and distributes it to communities in need, to pack food parcels and prepare sandwiches for those facing hunger and homelessness.

Global Community Day

For our 20th annual Global Community Day in 2025, our colleagues, along with family and friends, came together across more than 80 countries and territories to deliver on our shared mission of enabling growth and economic progress in the communities we serve. Over the past two decades, Citi volunteers have participated in more than 1.2 million volunteer engagements around the world, providing meals, planting trees, building homes and much more.

The volunteer events, connections and stories that are part of Global Community Day demonstrate the positive impact we have been able to make by sharing our time, skills and talents. Read more about 20 Years of Global Community Day here.

Global Community Day 2025

45,000+
volunteer engagements

114,000+
volunteer hours

900+
events

80+
countries and territories

Human Capital Management

Our People Strategy

With approximately 226,000 colleagues driving our progress globally, we're committed to ensuring that the best and brightest want to be at Citi — and can thrive here. Every day, our clients benefit from the range of backgrounds, perspectives and experiences our people offer.

We strive to make Citi a great place to work, for everyone, by offering a career experience defined by growth, inclusion and global impact. We empower colleagues at every career stage to develop their skills, build meaningful connections and advance in a culture promoting meritocracy and shared success.

Our People Strategy Priorities

Our people strategy is focused on the following priorities to help us advance the competitive strength of our workforce:

- Attracting, hiring and retaining the best talent from the broadest pools available, ensuring we have the right skills in the right roles
- Providing opportunities for growth and competitive rewards to our people at all stages of their careers
- Building a strong pipeline of leaders and fostering a culture where every colleague can deliver their best
- Committing to transparency to promote accountability, credibility and effectiveness in achieving the firm's goals

Attracting, Developing and Advancing Talent

With colleagues serving clients in more than 180 markets, Citi is home to a wealth of talent globally. We aim to attract and support exceptional people and create an environment where they can thrive.

From investing in new talent to fostering future leaders, our approach focuses on developing the skills colleagues need today and tomorrow to deliver on client and business goals and forge long-term careers. Our commitment to career development and building a strong talent pipeline drives the opportunities we provide, ensuring our employees have access to mentoring, internships, executive thought leadership and rotational programs.

Recruit, Retain and Promote

We recognize that talented, motivated teams — from the C-suite to all levels and areas of the firm — are critical to our success. We continue to strengthen our talent pipelines and hone our hiring processes, and we're committed to paying equitably and competitively to attract and retain talent.

Equal Employment Opportunities

We strive to maintain an environment in which development opportunities are widely available, where people are hired and advanced on their merits and where our colleagues treat each other with respect. We are fully committed to equal employment opportunities, fair employment practices and nondiscrimination.

For more information, see the Human Rights section of this report, our Code of Conduct and our website for policies on fair employment and compensation.

Early-Career Initiatives

Citi is committed to fostering an inclusive workforce, recognizing that broad perspectives strengthen our organization and drive innovation. Our comprehensive early-career programs provide hands-on experience, mentorship and professional development that builds critical thinking and leadership skills. Programs are open to college students and recent graduates and include the opportunity to participate in social and networking events, with the goal of helping participants grow and build meaningful careers.

In 2025, we attracted more than 450,000 applications globally across all businesses and functions. We welcomed over 1,200 summer interns at more than 45 Citi locations globally.

Examples of our early-career programs include:

- Our **Early Insights Programs** enable us to identify, engage and develop high-potential students early in the academic lifecycle. Designed for first- and second-year undergraduate students, flagship initiatives such as the Freshman Discovery Program and Early Identification Program provide structured exposure to Citi's businesses, culture and technical disciplines, supported by mentorship and targeted development experiences.
- **The Citi D1 Athlete Development Program** is a virtual mentorship program supporting NCAA Division I student-athletes pursuing careers in financial services. Each participant is paired with a Citi colleague who is a former student-athlete to receive professional development support and mentorship in navigating the finance industry. Students participate in business workshops, senior speaker sessions, networking opportunities and technical training.
- Citi continues to partner with **Lime Connect**, a global 501(c)(3) nonprofit organization serving individuals with disabilities. In 2025, Citi early-career colleagues engaged with students through on-site networking events and Lime Connect Fellowship Program interviews. Lime Connect also provides opportunities for Citi employees to strengthen allyship and inclusive leadership through virtual employer training programs.
- Through our **high school engagement efforts**, we raise awareness of opportunities in the financial services industry and support students in exploring potential career pathways. For example, in partnership with the New York Jobs CEO Council, Citi participates in Career Discovery Week, hosting high school students from across New York City for structured programming that introduces workplace skills, career opportunities and workforce-entry pathways.
- Several **UK programs** provide career entrants from various communities with exposure to financial services careers. The UK Apprenticeship Program, with opportunities across product lines, enables apprentices to work toward diplomas or degrees. Insight pipeline programs, in partnership with our Inclusion Networks in London, provide first-year university students with an understanding of what it is like to work at Citi and the opportunity to develop employability and soft skills.

Developing and Enabling Our Talent

We're committed to helping our colleagues gain the skills and experience they need to develop, own their careers and contribute to the company's long-term success.

We invest in career development for colleagues of all backgrounds by providing access to learning tools and platforms, along with support from their managers. In addition, we offer initiatives such as training, mentorship, networking opportunities, rotational programs and strategic partnerships. In 2025, colleagues recorded more than 8.9 million professional development hours, with an average of 24.2 hours per person.

We enable and encourage every employee to create an individual development plan aligned with their career aspirations. We view development as a continuous journey, where every step an employee takes strengthens both their personal growth and Citi's success. Managers play a key role in supporting this journey, while Citi provides the tools, resources and opportunities to help each employee progress and achieve their goals. We are focused on empowering colleagues to own their development and career journeys. We encourage all colleagues to complete a development plan and have a development conversation with their manager about their development, including what skills and experiences they need to prepare themselves for their next steps. We have created the Development Hub, an internal site, which provides colleagues with access to resources on internal mobility, preparing for interviews and building their personal brand, along with resources for managers to help lead effective career development conversations with their teams. Additionally, senior leaders provide testimonials on their own careers and how they navigated them.

In 2025, Citi introduced a new learning experience through a cloud-hosted learning management system, providing a simple user experience and access to learning resources anytime, anywhere, including on mobile browsers. In addition, we partner with world-class institutions and providers to offer access to educational training and thought leadership, as well as covering a portion of upfront tuition costs for colleagues in the U.S.

Internal Mobility

In 2025, we promoted more than 31,000 colleagues who took on new roles and responsibilities throughout the year. We filled more than 55,000 roles, 44% of them through internal mobility, demonstrating our commitment to developing and retaining talent. To help colleagues identify internal opportunities, the Citi Careers website includes a Match Me feature, which connects an individual's skills, experience and career aspirations with open roles.

We also maintain ties with former colleagues through our alumni network. In 2025, we welcomed nearly 3,900 experienced individuals back to our Citi family.

Supporting the Well-Being of All Colleagues

At Citi, the well-being of our employees is a priority. Our global health strategy — Live Well at Citi — is dedicated to fostering a culture of well-being that enables our employees and their families to thrive at work and at home. We are committed to focusing on total health, which includes mental, physical and financial well-being. Citi offers a comprehensive suite of benefits, programs and resources to help employees and their families find the care, support and knowledge they need.

Mental Health

Citi is committed to supporting our colleagues' mental health and offers a wide range of free, confidential resources to help employees and their family members feel their best and get through life's challenges.

This includes counseling and behavioral health programs, education and outreach, and offering semiannual trainings for managers on how to recognize when an employee is struggling, respond with confidence and become familiar with available services.

Physical Health

Citi has on-site medical clinics or medical rooms at more than 40 locations across 20 countries, providing timely, high-quality and accessible health care to support Citi colleagues.

- In 2025, we added primary care services, including new preventive care services, at our on-site U.S. medical clinics.
- Citi expanded partnerships in 2025 that offer employees discounts on fitness and wellness studios and apps across geographies.
- In 2025, more than 8,000 colleagues worldwide participated in the five-week Citi Global Fitness Challenge, offered annually since 2012. Across all Live Well at Citi fitness challenges, employees recorded more than 27.8 million minutes of exercise.

Family and Social Health

Citi offers comprehensive leave options to our colleagues, whether to welcome a child, care for a family member or simply recharge. In the U.S., for example, our leave policies include:

- A 12-week sabbatical program that offers employees the chance to refresh, recharge and re-energize
- 16 weeks of paid leave for new parents, no matter the path to parenthood, and birth parents receive additional paid recovery time of up to eight weeks — one of the strongest parental leave policies across major banks
- Paid time off for volunteering and grief leaves
- Two weeks of paid leave annually to care for an immediate family member

Financial Health

Citi offers competitive retirement contributions and investment options to support employees' long-term financial goals.

Through discounts and value-added benefits, Citi also helps employees save money on everyday expenses and make progress toward financial goals.

Pay transparency and providing equitable and competitive pay are central to our talent philosophy. We have introduced market-based salary structures and bonus guidelines in various countries, and we provide salary ranges on job postings in the U.S., Canada and select European countries.

Pay Equity

Providing our people with pay transparency and equitable, competitive pay across gender and other dimensions is central to our talent philosophy. Citi has introduced market-based salary structures and bonus opportunity guidelines in various countries worldwide and posts salary ranges for external job postings in the U.S., Canada and select European countries, which aligns with the company's commitment to pay equity and transparency.

In addition, Citi has focused on measuring and addressing pay equity within the organization through ongoing reviews and actions. Our annual pay equity analysis for 2025 determined that, on an adjusted basis, global gender and U.S. racial base pay gaps are less than 1% in each case. The raw pay gap analysis determined that the median base pay for women globally is 81% of the median for men globally, and the U.S. racial base pay gap is less than 1%. The adjusted pay gap is a true measure of pay equity, or "like for like," that compares the compensation of women to men and U.S. minorities to non-minorities when adjusting for factors such as job function, title/level and geography.

Fostering Excellence, Accountability and Inclusion

At Citi, we know that our culture shapes thousands of daily decisions, from how we respond to clients, evaluate risks and collectively solve problems, to the opportunities we seize. The culture we build underpins and illustrates what we believe and how we support clients, shareholders and each other. It also drives belonging and performance, enabling us to deliver our full potential.

Citi's Way: Our Firmwide Culture Initiative

Citi is reinforcing its Leadership Principles — Taking Ownership, Delivering with Pride and Succeeding Together — through a behavioral science-led initiative called Citi's Way. This is a robust program focused on the key working habits that support our leadership culture at the firm.

Guided by the Citi Culture Council and governed by the Compensation, Performance Management and Culture Committee, this effort is led by the Culture, Performance and Accountability team through key initiatives that support movement toward Citi's target culture state.

Our Talent and Engagement Principles

To promote the decision-making, culture and behaviors that support our people strategy priorities, we're guided by our talent and engagement principles:

- A workforce consisting of the best talent from the broadest pools available allows us to best serve our clients and communities globally.
- Our talent and engagement initiatives enable colleagues of all backgrounds to feel valued and to thrive.
- As a global company, we celebrate the vibrant cultures and communities of our workforce.
- We comply with the law in the places where we operate.

In 2025, key initiatives focused on strengthening cultural alignment, collaboration and engagement across the organization.

Efforts included integrating habits and practices through new guidance on building effective networks and the "Know the Why" framework to connect strategic priorities with daily work.

We expanded learning programs with the launch of the Citi's Way Habits in Action virtual workshop, as well as a new digital module for new hires, while executive development programs reinforced culture themes. We also promoted Citi's Way through firmwide communication initiatives, including a relaunched Culture Hub.

Additionally, a network of over 2,500 volunteer Changemakers helped drive cultural adoption, and we boosted engagement through in-person activation events at key locations.

Fostering Inclusion and Allyship

Our 12 Inclusion Networks, comprising nearly 280 chapters globally, aim to help foster belonging at Citi. Open to all colleagues and co-led by senior leaders, these networks represent a variety of backgrounds and communities important to our people — and reflect the communities and clients we serve.

These networks offer meaningful ways for colleagues to connect, learn and support each other. For more than two decades, our Inclusion Networks have been rooted in the belief that having a workforce with a variety of backgrounds, experiences and perspectives strengthens our ability to serve clients and communities. Today, more than 42,000 colleagues of all backgrounds are members.

Our Inclusion Networks follow:

- Citi Asian Heritage Network
- Citi Black Heritage Network
- Citi Disability and Neurodiversity Network
- Citi Families Matter Network
- Citi Generations Network
- Citi Hispanic/Latino Heritage Network
- Citi Interfaith Network
- Citi Multicultural Heritage Network
- Citi Pride Network (LGBTQIA+)
- Citi Salutes® Network (Military Veterans)
- Citi Social Mobility Network (UK)
- Citi Women® Network

In addition to Inclusion Networks, our Allyship 365 initiative fosters everyday allies for inclusion and belonging. At Citi, we believe that we all can be allies regardless of gender, ability, race/ethnicity background, experience or other ways of identifying. Allyship 365 resources and content are shared with all colleagues globally.

Voice of the Employee Survey

For more than 25 years, our annual Voice of the Employee (VOE) survey has helped us listen, learn and act on what matters most to our colleagues. The VOE Survey Framework is designed to gain insight into the employee experience, organizational culture and overall levels of engagement and belonging at Citi.

In 2025, we maintained a high response rate, with 83% of colleagues participating in the survey. Colleagues remain focused on delivering excellence to clients, and ethics continues to be our signature strength.

2025 results also suggest that colleagues are becoming more confident in the direction of the firm and are open to navigating change. Colleagues report a strong sense of clarity about their roles, feel trusted to make decisions and feel that they are encouraged to speak up and challenge. Once a decision is made, those surveyed report that teams move forward with alignment. Colleagues also shared where we have an opportunity to improve their experience at Citi, notably in helping manage stress levels, facilitating stronger information sharing across teams and improving satisfaction in their involvement in decision making.

Feedback from Citi colleagues is critical to our strategy. What leadership learns from the VOE influences how we operate, our culture and the overall experience working at Citi. We take the results seriously and are committed to keeping colleagues apprised about how we are acting on them.

90% of survey respondents agree that at Citi, we deliver excellence to our clients

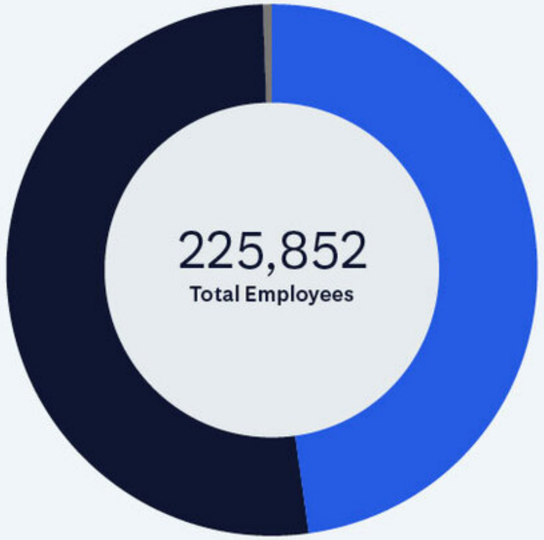
95% feel accountable to identify and escalate issues that present risks to our firm

81% feel Citi is making the changes necessary to compete effectively

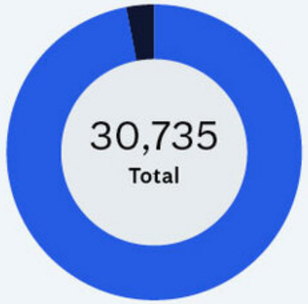
88% agree that people on their team are open to change

Global Workforce Data*

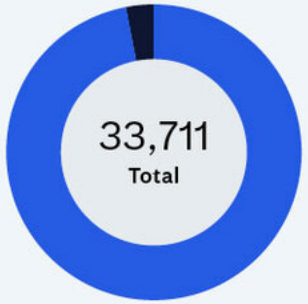
Total Employee Head Count
- 223,695 Full-Time
- 2,157 Part-Time



Employees by Gender**
- 110,145 Women
- 115,687 Men
- 20 Undisclosed



New Employee Hires
- 29,844 Full-Time
- 891 Part-Time



Employee Turnover
- 32,902 Full-Time
- 809 Part-Time

Total Employees by Physical Cluster

Cluster	Total Employees	Hires	Turnover
North America	85,321	11,416	12,080
United Kingdom	10,256	1,279	1,117
Europe	6,774	544	662
Japan, Asia North & Australia	9,779	816	1,229
Latin America	46,779	6,952	8,968
Middle East & Africa	4,741	475	642
Asia South	9,220	1,034	1,198
International Hub	52,982	8,219	7,815

* Based on self-ID data only. Data as of December 31, 2025.
** Twenty employees did not disclose.

Responsible Business

Ethics at Citi

Each of our employees shares a common responsibility to adhere to the highest ethical standards in everything they do. We expect our employees to prioritize excellence — for our clients, in our operations and in our risk and controls environment — and to provide our products, services and expertise in a systemically responsible manner, while complying with all applicable laws, regulations and Citi policies. To reinforce this, we establish and communicate our principles and expectations through our Mission and Value Proposition, our Leadership Principles, our Code of Conduct, various training and development opportunities, employee engagement initiatives and communications from our senior leaders.

Tone From the Top

We uphold strong ethical standards through our governance framework and through programs and efforts that embed our expectations for behavior throughout the organization. This starts with our Board of Directors. With oversight from the Compensation, Performance Management and Culture Committee, our senior leaders reinforce appropriate conduct and accountability within the organization, and empower our employees to make ethical decisions, escalate issues and adhere to our standards of conduct.

We expect all Citi colleagues to be leaders, but we recognize that our managers, in particular, are role models. They must lead by example, inspire their teams to live our values and reinforce the importance of understanding and following both our Mission and Value Proposition and our Leadership Principles.

Our Leadership Principles

Holding ourselves and each other to the high standards outlined in these principles is integral to our culture and our commitment to operating in our clients' best interests, driving economic value and managing risk.

We Take Ownership

We challenge one another to a higher standard in everything we do.

- Greet change with optimism, curiosity and resilience
- Speak up with candor and welcome challenge from others
- Learn from experiences, adapt and improve
- Prioritize the greater good when contributing to and honoring group decisions

We Deliver With Pride

We strive for client excellence, controls excellence and operational excellence.

- Simplify, standardize and clarify work
- Hold self and others accountable for managing risk with appropriate controls
- Create long-term value by fixing root causes
- Take pride in always doing the right thing

We Succeed Together

We value and learn from different perspectives to surpass stakeholder expectations.

- Break down barriers to deliver the best of Citi
- Measure performance through the lens of our stakeholders
- Invest in colleagues from all backgrounds
- Show empathy for colleagues, clients and communities

Acting With Integrity

We empower our employees to do what's right by setting clear expectations, providing tools and educational resources to reinforce ethical decision-making, and consistently providing information about the various resources available for escalating concerns.

Code of Conduct

Our Code of Conduct, updated most recently in September 2025, promotes a culture that enables accountability and strong risk management. It outlines our commitment to integrity in all aspects of our business, including the standards of ethics and professional behavior expected of employees and representatives of Citi when dealing with clients, business colleagues, shareholders, communities and each other. Our Code also provides an overview of key legal and regulatory requirements and select global policies.

Published in 18 languages, our Code applies to all directors, officers and employees of Citi. The expectations within the Code apply regardless of whether our employees are at work, at work-related events or together outside work.

Upon joining Citi, employees must acknowledge that they have read and will comply with our Code. Individuals performing services for Citi may also be subject to our Code by contract or agreement. Violations can result in disciplinary action up to and including termination of employment or other relationship with Citi.

We provide Code of Conduct training to new hires globally when they join Citi, as well as to nonemployee workers performing services for Citi at their time of onboarding. In addition, we ask these members of our workforce to reaffirm their commitment to our Code through annual Code of Conduct training.

Escalating Concerns

In line with our expectations for ownership and accountability, we expect members of our workforce to take responsibility for their decisions and actions, hold others accountable and immediately raise concerns about actual or potential misconduct.

Our Code of Conduct emphasizes the principle that, when in doubt, employees should always err on the side of escalating concerns. It provides an overview of the types of misconduct and concerns that require escalation and the resources available to employees for prompt escalation, as well as a link to the full Citi Escalation Policy, which provides even more information for employees about escalation requirements and resources.

Employees are encouraged to raise concerns to their manager, but if they feel uncomfortable doing so, Citi provides a number of escalation resources, including the Ethics Hotline.

The Ethics Hotline is a confidential, anonymous reporting mechanism that provides different channels for employees and any third party, including members of the general public, to report concerns about unethical behavior to the Citi Ethics Office. In addition to internal and public-facing websites that facilitate submission of concerns, a telephone line is available 24 hours a day, seven days a week, with live operators who can connect to translators in multiple languages.

The phone and web submission portals of the Ethics Hotline are administered by an outside service provider, which directs all concerns to the Citi Ethics Office. The Ethics Office reviews and assesses all concerns and directs them to the appropriate function for handling based on the nature of the concern. See our Code of Conduct for more information on escalating concerns, investigations and our prohibition of retaliation against those who raise concerns or participate in subsequent investigations.

Employee Feedback: Ethics at Citi

Hearing from employees is one important way we assess the strength of ethics and accountability across our company. As part of our annual employee survey, we include an ethics index to gather feedback from employees about the following:

- Comfort with reporting unethical practices without fear of reprisal
- A feeling of accountability to identify and escalate issues that present risk to Citi
- Confidence that Citi will act upon reported legal or ethical violations
- A belief that colleagues act with integrity
- Manager encouragement of ethical conduct even in the face of pressure to meet business objectives

In 2025, the ethics index was 91% favorable, indicating that a majority of employees responded positively on these key ethics-related items.

Transparency for Employees

Annual Ethics Hotline Summary

To reinforce how raising concerns leads to meaningful action within Citi, the Citi Ethics Office makes available to all employees an annual summary of the types of concerns it has received, including those resulting in corrective actions.

Spotlight on Ethics

Through this quarterly communication to employees, we continue to share the results of Ethics Office investigations to reinforce to our workforce that concerns are investigated and to highlight areas where ethical lapses can occur. The Spotlight includes corrective actions that resulted from described Ethics Office investigations, to reinforce again that speaking up leads to meaningful action. In 2025, we used the Spotlight on Ethics to highlight principles surrounding our Code of Conduct, employee social events and expectations regarding the good-faith completion of any assigned training.

Risk Management

We employ robust policies and practices to help detect and prevent corruption, address potential environmental and social risks in our portfolio, and safeguard data and customer privacy. These rigorous practices support our efforts to grow a successful, respected business that delivers the best possible results for our clients, customers and communities.

Managing Corruption and Tax-Related Risks

Financial Crimes Risk Management Programs

Our Chief Compliance Officer provides regular reports on our efforts related to anti-bribery and corruption, anti-money laundering (AML) and sanctions compliance to the Citi Board of Directors or a committee of the Board, as appropriate. As of December 2025, more than 220,000 employees and contingent workers completed our combined online course that provides training on risk management topics, including AML, sanctions and anti-bribery.

Programs to Combat Financial Crimes

Anti-Bribery and Corruption Program: Citi has policies, procedures and internal controls that are reasonably designed to comply with applicable anti-bribery laws, and we conduct an annual bribery risk assessment of our global business lines. We provide our staff with anti-bribery training annually and supplement it with targeted training and communications as needed. For more information, see the Citi Anti-Bribery and Corruption Program Statement.

Anti-Money Laundering Program: Our AML Program helps protect our clients, our franchise and the global financial system from the risks of money laundering and terrorist financing. Citi works through cross-functional teams to provide effective enterprise AML risk management and to meet our AML-related requirements at both the global and the local levels. For more information, visit our AML Program website.

Sanctions Program: We maintain a robust, risk-based Sanctions Program, which applies globally. It includes enterprise-wide controls reasonably designed to comply with applicable sanctions laws and regulations commensurate with the firm's sanctions risk profile. Through our internal communications channels, we remind colleagues that they may not, directly or indirectly through a third party, facilitate prohibited business activities in circumvention of applicable sanctions and/or sanction-related controls.

For more information about our efforts to combat money laundering, corruption and bribery, as well as our work to comply with sanctions and regulations, see the "Our Business" section of our Code of Conduct.

Taxation Policies and Standards

Citi does business in more than 180 countries and jurisdictions and maintains strong review and escalation processes that enable us to adhere to high standards of compliance with applicable tax laws. We are a current income taxpayer, both within and outside the U.S. Our tax profile is consistent with the locations of our business operations, and we adhere to Organisation for Economic Co-operation and Development (OECD) standards on substance and transparency.

We emphasize strong internal controls and transparency with global tax authorities and share information relevant to our tax profile. We supplement this transparency with additional country-by-country reporting, which is required under the OECD's action plan to address base erosion and profit shifting. Tax management is overseen by our Chief Tax Officer, who reports to the Chief Financial Officer. Our global tax approach is reviewed with the Audit Committee of the Board of Directors.

For client-related tax matters, Citi maintains a strong system of controls to support reporting and withholding requirements. We have systems and processes to comply with the Foreign Account Tax Compliance Act and the Common Reporting Standard in all applicable countries where local implementing guidance has been issued. Citi monitors global laws, rules and regulations affecting client taxes and analyzes any changes. Similarly, we have firmwide requirements applicable to customer transactions, under which Citi will only engage in transactions where there is a high degree of confidence that the tax aspects will be accepted by the respective taxing authorities. We also conduct firmwide training across our business segments and functions to promote awareness on tax evasion.

For more information on how taxation impacts Citi, see page 185 of our 2025 Form 10-K.

Public Policy

As a global company, Citi is subject to extensive laws, rules and regulations that impact revenues and operating expenses. Because of the potential impact that public policies can have on our business, employees and customers, Citi engages with policymakers to advance and protect the company's interests globally. See our full Political Engagement Statement for more details. The Government Affairs team works closely with our core businesses and functions to advocate for the company's interests, through direct contact with government officials or indirectly through trade and business associations.

Safeguarding Data and Protecting Customer Information

Data security and customer privacy are top priorities for Citi and for our stakeholders. As digital solutions expand and are more fully integrated into daily life, we recognize the importance of having robust programs and processes in place to prevent and respond to privacy and security threats.

Cybersecurity

Our Chief Information Security Office ensures that an appropriate level of cybersecurity governance, capabilities and controls exists to protect Citi's and our clients' assets and information, with end-to-end accountability across the firm. Our strategy incorporates architecture, technology, tools, policies and processes to prevent, detect, respond to and recover from cyber threats quickly.

Key Elements of Our Cybersecurity Program

Program Governance

- Oversight from our Board of Directors
- Regular reviews by regulators and by internal and external auditors
- Globally managed by the Head of Technology and Business Enablement

Third-Party Certification

Certified compliance with the ISO 27001 standard for our global information security and technology infrastructure programs

Training

Training provided annually to employees on how to properly handle and maintain the security and privacy of Citi's and our clients' assets and information

Comprehensive Approach to Managing the Risk of Cybersecurity Breaches

- Regular risk assessments and internal controls to defend against breaches
- Technology and cybersecurity policies based on established industry standards
- Robust technologies to protect data and systems, supported by a strong team with deep expertise in industry and government
- Secure networks to protect systems and databases, and continuous improvement of capabilities to meet the challenge of an evolving threat environment

We maintain robust processes to ensure appropriate reporting and notification in the event of a potential breach, including:

- Reviewing the event to determine whether it meets any regulatory or legal reporting requirements in the jurisdiction(s) where it occurred or had an impact
- Notifying the customers impacted as required by the laws or regulations of the impacted jurisdiction(s)

Industry Leadership

- Working with our clients, peer financial institutions and government entities on a global scale to enable the collective security of the financial services sector by:
  - Sharing best practices
  - Exchanging tactical information about specific cybersecurity threats
  - Conducting joint cyber-resilience exercises
  - Driving adoption of industrywide standards and approaches
- Receiving and sharing information with the banking and critical infrastructure communities, and leveraging that information to strengthen our internal controls and practices and to help protect Citi from attacks targeting other firms

Secure Solutions

Investment in and development of advanced security solutions to safeguard information:

- A multifaceted approach to supporting password-less capabilities, including biometric options such as voice recognition or fingerprints
- Next-generation security components that support digital and mobile growth and enable enhanced security features for our mobile applications
- Advanced technology for improved cyber incident monitoring, detection and response capabilities

Privacy

In today's digital world, protecting personal, client and corporate information is a fundamental part of building trust and providing banking services in a responsible manner. At Citi, safeguarding information is critical to how we operate and a responsibility we approach with care.

Citi has a Privacy and Responsible Information Management Program led by our Chief Privacy Officer. This program provides a comprehensive, coordinated, firmwide approach to proactively managing privacy and information risks across all business lines, functions and countries where we operate. It promotes fair and lawful collection, use and processing of personal information.

The Information Management, Privacy and Cross-Border Transfer (IMPaCT) team sets companywide standards for managing personal information, records and transfers, as well as providing expert guidance and overseeing the execution of processes in alignment with those standards.

We also have a Head of Privacy Legal within the General Counsel's Office who leads a team that sets privacy legal strategy across the firm.

Together, these groups support the ethical and transparent handling of information, in line with applicable requirements. This multilayered approach strengthens accountability, promotes proactive risk management and reinforces responsible practices.

Our internal policies establish clear principles for the collection, processing and disposal of personal information. They require, among other things, that personal information be collected and used only as necessary for the performance of the services offered and for the purposes disclosed. Through our Privacy Notices for customers and clients, we share information about how information is used, outline rights under applicable laws and provide resources to help manage preferences.

Citi also provides training to reinforce these principles and support the proper handling of personal information throughout the information lifecycle. All new Citi colleagues and nonemployees are required to complete this training when they join the company, and existing Citi colleagues and non-employees must complete it biannually.

Protecting Digital Identity

We recognize the importance of protecting the confidential information of our customers and the crucial role banks play in this effort. Verifying our customers' identity is fundamental to safeguarding their financial assets and protecting their privacy. Our aim is to provide our clients and customers with seamless, intuitive digital tools and solutions that are designed to protect personal data.

To help protect our customers' digital identities, we offer options for secure access to their accounts. For example, customers can sign on to the Citi Mobile App using biometric authentication methods, such as fingerprint or facial recognition, which provide an additional layer of security to passwords. Customers also have the option to enroll in two-factor authentication, as a second form of verification.

We also provide customers with resources and information related to safety and security. Our U.S. online Security Center enables customers to learn what Citi does to protect them and what they can do to protect themselves against identity theft and other security risks.

Citi provides ongoing training for our employees to build awareness of, and skills related to, new digital identity technologies. In addition, we engage with clients, partners and industry experts on the trends, challenges and opportunities related to digital identity and to explore technologies with the potential to meet our customers' needs.

Emerging Financial Technologies

Amid sustained interest from clients and investors, we monitor developments and innovations related to financial technology, including digital assets, distributed ledger technology, artificial intelligence (AI) and quantum computing. Our processes help us maintain a competitive edge by guiding the safe adoption of emerging technologies and implementation of appropriate guardrails to mitigate novel risks. We carefully evaluate the evolving regulatory landscape and the associated financial and nonfinancial risks, to ensure that we meet supervisory expectations and that our approach aligns with our regulatory frameworks.

Artificial Intelligence

Citi has made AI a top priority, given its potential to improve productivity and efficiency significantly. For example, AI has the potential to amplify the power of employees by allowing them to improve productivity and to continue to reinvent their skills. Citi is deliberate in managing the risks related to AI and deploying it in a responsible manner. In fact, well before AI was being widely adopted in our field, we were one of the first companies to develop our own set of ethical principles for AI. We build governance and oversight into our deployment of AI within the firm, and evaluate use cases to effectively identify and mitigate risks.

Environmental and Social Risk Management

Our ESRM Policy

Our Environmental and Social Risk Management (ESRM) Policy guides our approach to responsibly managing environmental and social risks associated with our financing. We established the policy in 2003, and we continue to evolve our approach in response to emerging risks.

The ESRM Policy covers a broad scope of transactions in sectors that may have risks related to air quality, water quality, climate change, biodiversity, local communities, labor, human rights (including Indigenous Peoples' rights) and other environmental and social issues, which, if not properly addressed, could lead to risks for Citi.

Our policies and procedures reference international industry standards, such as the:

- World Bank Group's International Finance Corporation (IFC) Performance Standards and Environmental, Health, and Safety Guidelines
- Accountability Framework initiative
- Forest Stewardship Council
- Roundtable on Sustainable Palm Oil
- Round Table on Responsible Soy
- Voluntary Principles on Security and Human Rights

Our ESRM Policy

Environmental and Social Policy Framework:

The ESRM Policy is summarized publicly in our Environmental and Social Policy Framework, which includes the following:

- Scope of our ESRM Policy
- Descriptions of risk-screening practices and categories, independent reviews and action plans
- Overviews of our policy Prohibitions, Areas of High Caution and Sector-Specific Requirements

ESRM Policy Scope:

A transaction or client relationship may trigger the ESRM Policy for four reasons:

- Transactions with Use of Proceeds directed to a specific physical asset or project
- Clients in sectors with ESRM Sector-Specific Requirements
- Clients/transactions with risks in an Area of High Caution
- Sustainable finance products (e.g., green bonds or sustainability-linked loans)

The ESRM team reviews transactions subject to our policy and identifies opportunities for improvement and engagement.

Policy Implementation

The Citi ESRM Policy is applicable broadly across our financing activities, and its implementation is a shared responsibility across the firm. Business units take the first step of identifying transactions for referral to our centralized team of ESRM specialists, who evaluate transactions that have triggered review under our ESRM Policy.

When a transaction opportunity is first explored, our ESRM team works with Citi bankers to identify any potential environmental and social impacts. They also determine whether any action is needed should the transaction move forward in order to align the transaction with our ESRM Policy prior to final approval. If we find a risk of adverse impacts, we may conduct enhanced due diligence (appropriate to the financial product and underlying client activity), and we evaluate the client's commitment and capacity to avoid, mitigate and/or manage those impacts. This provides us with an opportunity to engage with clients on industry best practices across their sectors.

Our ESRM approach to project-related financing is informed by internationally recognized standards and frameworks, such as those articulated by the World Bank and the IFC. Higher-risk, project-related loans receive in-depth reviews by independent environmental and social consultants and involve client engagement to understand their environmental and social risk management approach. If gaps are found between a client's environmental and social plans, policies or practices and the expectations outlined in our ESRM Policy, we require the development of an Environmental and Social Action Plan (ESAP) to fill the gaps and reduce the associated risks to Citi. As a condition of financing, we require the client to implement the ESAP by specifying covenants in the loan agreement. We then monitor progress over time, using an independent consultant when needed to conduct on-the-ground audits and report back to lenders.

See our Environmental and Social Policy Framework for more information about the steps in our risk-screening process for project-related finance transactions, from initial identification of business opportunities through ongoing monitoring.

In addition, for non-project-related transactions where risks have been flagged for ongoing monitoring, our ESRM team uses our ongoing client reviews and engagement touchpoints to assess the status of environmental and social risks.

ESRM Training

We offer a web-based training module, for relevant employees, to raise awareness on the scope of our ESRM Policy. This training helps Citi colleagues to identify potential environmental and social risks in transaction and client reviews that require referral to the ESRM specialist team, ensuring effective implementation of the ESRM Policy.

2025 ESRM Policy-Covered Projects[1]

Funded Project Finance Loan Breakdown[2]

By Sector	A	B	C	Total
Infrastructure	0	0	4	4
Oil and Gas	1	0	0	1
By Region	**A**	**B**	**C**	**Total**
North America	1	0	4	5
Latin America[3]	0	0	0	0
Europe	0	0	0	0
Middle East and Africa	0	0	0	0
Asia Pacific	0	0	0	0
By Country Designation[4]	**A**	**B**	**C**	**Total**
Designated	1	0	4	5
Non-designated	0	0	0	0
By Independent Review	**A**	**B**	**C**	**Total**
Yes	1	0	4	5
No	0	0	0	0

Funded Project-Related Corporate Loan Breakdown[2]

By Sector	A	B	C	Total
Power	1	2	0	3
Electric Vehicle /EV Batteries	0	2	1	3
Infrastructure	0	2	0	2
Chemicals	0	1	0	1
Mining and Metals	0	1	0	1
Oil and Gas	1	0	0	1
By Region	**A**	**B**	**C**	**Total**
North America	0	0	0	0
Latin America[3]	1	4	0	5
Europe	0	2	1	3
Middle East and Africa	0	2	0	2
Asia Pacific	1	0	0	1
By Country Designation[4]	**A**	**B**	**C**	**Total**
Designated	0	2	1	3
Non-designated	2	6	0	8
By Independent Review	**A**	**B**	**C**	**Total**
Yes	2	6	0	8
No	0	2	1	3

[1] Projects funded by Citi.
[2] Projects are categorized as follows: Category A: Projects likely to have potential significant adverse social or environmental impacts that are diverse, irreversible or unprecedented. Category B: Projects likely to have potential limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures. Category C: Projects likely to have minimal or no social or environmental impacts.
[3] Within this data set, Mexico is considered part of Latin America.
[4] Designated Countries are OECD member countries on the World Bank High Income Country list, and Non-designated are all other countries not meeting those two criteria.

Transactions and Client Relationships Screened by ESRM

All transactions submitted to the ESRM team go through an initial screening. Once that initial screening is complete, the ESRM team conducts additional due diligence for transactions that are 1) related to a specific project, 2) trigger an ESRM Sector-Specific requirement, or 3) trigger an ESRM Area of High Caution. The data on this page shows the total transactions and client relationships screened by the ESRM team, regardless of whether a transaction proceeded to final close.

2025 by Region

1,408
2025 Total

244 North America
230 Europe
165 Global (multiple regions)
246 Latin America*
162 Middle East and Africa
361 Asia Pacific

Total by Year

2025
1,408

2024
1,516

2023
1,472

* Within this data set, Mexico is considered part of Latin America.

Human Rights

Our Commitment to Respect Human Rights

Citi supports the protection and fulfillment of human rights around the world and is guided by fundamental principles of human rights, such as those in the U.N. Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (including its fundamental core conventions). We engage with a range of stakeholders, such as employees, clients, suppliers and peers, as well as human rights experts, civil society organizations and investors, to support our efforts to respect human rights in line with the U.N. Guiding Principles on Business and Human Rights — a global framework for preventing and addressing the risk of adverse impacts on human rights linked to business activity.

During the development of our Statement on Human Rights, we considered our actual and potential human rights impacts to identify the most salient human rights risks faced by our employees, workers connected to our supply chain and individuals who might be affected by our clients' operations. We review and update the statement periodically to reflect the evolution of responsible practices within our industry.

Our Environmental and Social Risk Management (ESRM) Policy guides our approach to assessing environmental and social risks related to financing our clients' business activities. Learn more about our commitment to human rights and our approach to human rights protections:

- Citi Statement on Human Rights
- Environmental and Social Policy Framework
- Environmental and Social Risk Management section
- United Nations Guiding Principles Reporting Framework Index

Human rights content is integrated into an ESRM training module, which is available to all employees and mandatory for certain employees in relevant functions.

Our Salient Human Rights Risks

The U.N. Guiding Principles call for businesses to avoid causing or contributing to adverse human rights impacts and to prevent or mitigate negative impacts to which they are directly linked through business relationships.

The most severe potential human rights risks posed by our clients' activities, particularly in the context of project-related finance, are identified under our ESRM Policy. Project finance and project-related lending gives us the most insight into specific project details and the ability to use environmental and social loan covenants to help mitigate risk. We also screen for human rights risks in other types of corporate financing covered by our ESRM Policy. For more information on our salient human rights risks, see our Statement on Human Rights.

Respecting the Human Rights of Our Employees

Having a workforce of varied backgrounds, experiences and perspectives allows us to better serve our clients and communities. Citi believes that all members of our workforce should be treated with respect and dignity — a commitment embedded in our Code of Conduct. Our global policies and practices are consistent with the ILO core conventions regarding harmful child labor, forced labor, freedom of association, the right to organize and bargain collectively, equal pay, nondiscrimination and a safe and healthy working environment.

We expect every Citi employee to adhere to our Code of Conduct, which includes a commitment to human rights, prohibits discrimination and harassment, and promotes respect for the personal beliefs, culture, identity and values of every individual. Citi expects all employees and those providing services to Citi to respect the principles of equal employment opportunity and comply with all laws regarding fair employment practices and nondiscrimination.

Freedom of Association

Citi has employees who are represented by unions and works councils in a number of countries where we operate. In addition, a portion of our employee population is covered by collective bargaining agreements. We engage directly with our employees and through these associations to discuss issues such as health and safety, remuneration, work hours, training, career development, work time flexibility and equal opportunity. Information related to freedom of association is available to employees.

Respecting Human Rights in Our Financing Decisions

Effectively evaluating human rights risks related to our clients and the projects we finance is a sensitive and important challenge. To that end, we have established policies and practices that help us consider the respect of human rights as an integrated aspect of our business.

For example, where a transaction's financial and legal structure allow it, we may put loan covenants in place and monitor client mitigation efforts through our ESRM Policy implementation. Human rights concerns related to a particular client or transaction may be escalated to the specialist ESRM team for review and consultation, regardless of sector or financial product. Our ESRM team may further refer human rights risks we identify to relevant senior management reputation risk forums or committees.

In addition, our anti-money-laundering policies and practices help us avoid business transactions with potential human rights risks, such as human trafficking. However, there are times when the link is less direct between our financial services and human rights impacts. In these instances, we work to improve our clients' awareness and business practices.

Modern Slavery

Our ESRM Policy prohibits financing any client activities for which our due diligence identifies the use of forced labor and/or harmful or exploitative child labor, and/or when the relevant labor forces have been subjected to human trafficking. In response to legislation in the UK and Australia, our Modern Slavery Statements for those two countries cover information about our governance and policies related to modern slavery, risk assessment and due diligence processes, and training.

Due Diligence in Client Transactions

Citi has thousands of corporate and institutional clients. The U.N. Guiding Principles acknowledge the challenges presented by extensive business relationships. We have adopted the approach set out in the U.N. Guiding Principles of prioritizing our human-rights-related due diligence in the areas where the risk is most significant from the perspective of the people whose human rights might be affected.

We use our ESRM Policy and review process to screen transactions for social impacts, assess and manage risks consistently, and evaluate client operations against a common set of standards grounded in international best practices, including those related to human rights. See the Environmental and Social Risk Management section for details.

Access to Remedy

The U.N. Guiding Principles call on governments and companies to play their respective roles in ensuring that victims of human rights abuse have access to effective remedies and separately call on businesses to establish or participate in effective operational-level grievance mechanisms for the early identification of possible harms. Our approach to remedy can take many forms, depending on the type of impact and our relationship to it, and we also believe that the purpose of remedies can be achieved in various ways, including by taking steps to help prevent the recurrence of similar harms.

Ensuring access to effective remedy can be complex when it concerns impacts that might occur despite our efforts, or our clients' efforts, to avoid them. As a financial institution, our relationship to those impacts can be less clearly defined than with those that occur in our own operations, but we nevertheless encourage our clients — particularly when project-level lending is involved — to have policies in place and channels available to enable victims to lodge grievances, follow up on allegations and, where appropriate, provide processes to offer remedies or cooperate with authorities to make sure effective remedy is provided.

Identifying Human Rights Risks in Transactions

Our ESRM team screens transactions under the Citi ESRM Policy for potential human rights risks, as outlined in the table below. Further data related to ESRM Policy screening can be found in the Environmental and Social Risk Management section.

Project-Related Transactions: When human rights risks are identified, the ESRM team may recommend not proceeding with the opportunity (if the risks are deemed too high to address) or outline what further due diligence would be needed and which standards would need to be met for the transaction to proceed. If an opportunity progresses to the due diligence phase, our requirements include gaining access to project assessment information that allows us to benchmark according to relevant standards with the support of a qualified independent consultant. If a project is not aligned with Citi ESRM Policy expectations, we will not approve financing unless we can come to an agreement with the client on a plan to build capacity and to improve management processes that appropriately mitigate project risks in alignment with Citi ESRM Policy.

General Corporate-Level Transactions (e.g., Renewing Revolving Credit Facilities, Issuing Corporate Bonds): Although we do not have the same direct access to information in general financing as we do in project-related financing, we still identify sensitive sectors that we screen for potential elevated human rights risks. In addition, under our ESRM Policy Areas of High Caution, if a human rights risk is identified in any client sector for any financial product, the transaction is referred to the ESRM team for enhanced due diligence. When risks are identified, we review our clients' human rights policies and practices and evaluate their ability to avoid, minimize, manage and mitigate potential risks.

Human Rights Risks Screened During Transaction Reviews
Conflict Risk: Project-induced conflict risk, which may be tied to competition for resources or land
Cultural Heritage: Properties and sites of archaeological, historical, cultural, artistic and religious significance; unique environmental features and cultural knowledge; intangible forms of culture that embody traditional lifestyles
Environmental Justice: Potential environmental risks to marginalized communities, especially surrounding industrial developments
Indigenous Peoples: Concerns regarding the extent to which Indigenous communities are consulted during project development and have consented to impacts to their land, livelihood and cultural heritage
Labor Risks: Risks related to labor forces used in the construction of projects or other operations, including those associated with forced labor, child labor and human trafficking by project operators and their subcontractors
Resettlement: Resettlement of local communities, including Indigenous groups, as necessary for project implementation; requires resettlement action plans and should include efforts to obtain the free, prior and informed consent of Indigenous communities
Security Practices: Concerns about how project sponsors engage with public or private security forces protecting project sites

Respecting the Rights of Indigenous Peoples

Citi respects the collective rights of Indigenous Peoples, such as the right to self-determination, autonomy and participation in decisions that directly affect them. Furthermore, Citi recognizes Indigenous Peoples' distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands and territories, including the resources within these lands, which are fundamental to ensuring their survival.

We recognize the unique historical challenges faced by Indigenous Peoples and understand that their languages, beliefs, cultural values and lands often face threats placing them at a higher degree of vulnerability than other communities. Our ESRM Policy acknowledges this vulnerability and outlines our approach to transactions that may have the potential to impact Indigenous Peoples.

For more about our commitment, approach and due diligence processes in this area, see the statement we released in 2024. For 2025 data, see the graphic below.

New Transactions and Annual Reviews Flagged With Potential Risks to Indigenous Peoples:

In 2025, the Citi ESRM team flagged 39 transaction opportunities and annual reviews as having potential risks to Indigenous Peoples that required enhanced due diligence prior to proceeding.

Listening to Stakeholders

To ensure that we are living up to our commitment to respect human rights and to help identify emerging risks, we regularly communicate our approach externally, engage with stakeholders on their issues of concern and work to advance respect for human rights more broadly.

Although banks are often under pressure to disclose specific findings related to client projects, we are bound by legal requirements related to confidentiality that limit our ability to disclose such information. Citi respects the requirements for client confidentiality in the banking sector, while also maintaining rigorous adherence to our ESRM Policy, engaging clients and identifying solutions to human rights challenges.

We also assess our clients' grievance management for project-related loans. This includes a review of the project sponsor's stakeholder engagement process, as well as its operational-level grievance mechanisms that allow affected communities to raise concerns proactively with the project developers.

Serving our Customers and Clients Responsibly

Providing Financial Services Responsibly

At Citi, our standards and expectations require all colleagues to provide fair and equitable access to our products and services and to make decisions about their provision based on objective criteria.

We offer clients an array of products and services based on their needs and preferences, while adhering to our internal policies and procedures as well as applicable laws and regulations. We work to clearly disclose features, terms and conditions, and applicable fees for our products and services, so that clients can select those that are best suited to them. New products and services are approved by cross-functional committees that include senior executives from Risk, Legal, Independent Compliance Risk Management and other relevant units.

Citi has processes and controls in place, for relevant businesses, to handle customer complaints in a timely and effective manner. In addition, we have formal escalation processes to our governance committees and Board of Directors to facilitate consistent, timely and appropriate identification, analysis and escalation of potential consumer fairness, reputational and franchise risk issues.

Citi also has measures in place to monitor sales practices, including auditing and metrics that assess client risk profiles.

Treating Customers Fairly

We strive to adhere to high ethical standards, to earn and maintain the public's trust, and to deliver products and services that provide value, clarity and dependability, in line with our Treating Customers Fairly principles. We engage customers in multiple languages to support the diverse populations we serve, and our products and services are tailored to meet the needs of the individuals in the countries where we do business.

Global Policies for Financial Access and Fairness

Our Global Financial Access Policy establishes the guiding principles and minimum standards for fair and equitable access to the products, services, facilities, privileges, advantages or accommodations that Citi provides to customers and clients. Further, it prohibits discrimination against actual or prospective clients on the basis of race, ethnicity, sex (which encompasses gender as well as sexual orientation, gender identity and gender expression), religion, national origin, disability or other prohibited factors. This commitment is backed by training, processes, controls and oversight to help prevent discrimination.

Our Global Fairness Policy provides a framework for reviewing consumer fairness concerns and a sustainable model for managing emerging risks. The policy includes our internal requirements for assessing fairness risks related to new products and services development, marketing, sales (including variable incentive compensation), underwriting and onboarding, and all other aspects of the consumer product and services life cycle. It also includes internal controls processes to ensure that advertising and marketing is clear, truthful and not misleading.

We review our policies regularly and update them as needed. In response to concerns raised in 2025 about "fair access" to banking services, we updated our employee Code of Conduct and our customer-facing Global Financial Access Policy to clearly state that we do not discriminate on the basis of political affiliation in the same way we are clear that we do not discriminate on the basis of other traits such as race and religion. This formalizes what we have long practiced. We also updated our ESRM policy to remove the U.S.-specific firearms policy, which had been intended to promote the adoption of best sales practices as prudent risk management and did not address the manufacturing of firearms.

Our Treating Customers Fairly Principles

- **Works as described:** Consumers can predict how products and services will work.
- **Appropriate:** Citi offers products and services that are appropriate for consumers and meet their needs.
- **Value:** Consumers receive value that is reasonably related to the cost of the products and services.
- **Ease of understanding:** Consumers understand the terms and conditions of the products and services (particularly limitations and exclusions).

Employee Incentive Programs and Training

We consider alignment with our Treating Customers Fairly principles when developing variable incentive plans for employees in businesses that are covered by our Global Fairness Policy.

As part of our program, employees in our U.S. Consumer Cards and Wealth businesses complete annual Treating Customers Fairly training. The training focuses on identifying and escalating fairness issues and shows how fairness influences real-world results. In 2025, 98% of colleagues in relevant roles completed this training.

In addition, we have an annual Treating Customers Fairly continuing education program for the Citi Board of Directors, to refresh their knowledge and increase visibility of key fairness-related risks and topics. We also hold a Fair Lending Summit with senior management from across the company, to deepen their understanding of fair lending and consumer fairness.

Designing for Accessibility

Citi strives to provide products and services that meet the accessibility needs and preferences of our clients. For example, in several markets, we offer accommodations, such as large-print and braille statements; raised-line checks, registers and deposit slips; and braille and talking ATMs, through which customers can use their own or branch-supplied headphones to hear screen-displayed information. Additionally our bankers will read and explain materials upon request, and we can arrange appointments with qualified sign language interpreters for discussions that are too complex or lengthy for simple back-and-forth written communication. Citi also accepts calls through all telecommunications relay services, including 711 and video relay, where available.

We strive to make our public-facing digital content in the U.S. market conform to the internationally recognized Web Content Accessibility Guidelines (WCAG). This standard helps ensure that people with disabilities can effectively navigate our websites, apps, emails, banner ads, video ads and other digital content.

Financial Inclusion

Citi pursues a range of initiatives to help increase financial inclusion and expand access to capital and banking services for underserved and underbanked communities.

For example, our Access Checking account (available in the U.S.) is a simple, checkless bank account with low monthly service fees and no overdraft fees, which provides customers with a straightforward and cost-effective way to manage their finances. This reflects our commitment to provide affordable banking options to help customers establish and build long-term financial security.

In addition, Citi Financial Pathways is an online resource that provides tools to empower and help unbanked and underbanked customers make informed decisions about their financial future, regardless of where they are in their journey. We also collaborate with a range of community-based organizations and industry associations to expand the impact of our financial inclusion efforts.

Sustainability Accounting Standards Board Index

This index was prepared with reference to the latest available Industry Standards issued by the Sustainability Accounting Standards Board (SASB) as of 2025-12. The disclosures below relate to three financial sector standards aligned to our mix of businesses: Commercial Banks, Consumer Finance and Investment Banking & Brokerage. Unless otherwise noted, data and descriptions apply to our entire company, not just the businesses relevant to that sector. We do not yet disclose all metrics included in the sector standards, but we will continue to evaluate their relevance to our business. All data is as of and for the year ended December 31, 2025, unless otherwise noted.

Commercial Banks

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Data Security	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected	Quantitative	FN-CB-230a.1	For reasons driven by operational security, Citi generally does not publicly disclose details regarding security incidents unless otherwise required by law. Our approach to cybersecurity is detailed in this report, including our approach to cybersecurity breaches. • Risk Management > Safeguarding Data and Protecting Customer Information
	Description of approach to identifying and addressing data security risks	Discussion and Analysis	FN-CB-230a.2	• Risk Management > Safeguarding Data and Protecting Customer Information

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Financial Inclusion & Capacity Building	(1) Number and (2) amount of loans outstanding that qualify for programs designed to promote small business and community development	Quantitative	FN-CB-240a.1	Citi does not disclose this, but information about our work in this area can be found below. • Strengthening Communities • Sustainable Finance > Supporting U.S. Affordable Housing
	(1) Number and (2) amount of past due and nonaccrual loans or loans subject to forbearance that qualify for programs designed to promote small business and community development	Quantitative	FN-CB-240a.2	Citi does not report this information.
	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Quantitative	FN-CB-240a.3	Citi offers the Access Account — a simple, checkless bank account with low or no monthly fees and no overdraft fees, which provides customers with a straightforward way to save money and manage their finances. As of December 31, 2025, there were 472,949 active Access checking accounts. This figure excludes high-yield savings accounts. Since 2022, Citi has eliminated overdraft fees, returned item fees and overdraft protection fees, representing the company's continued commitment to expand access to banking products and services that can help advance economic progress, including for underbanked and unbanked communities. In addition to eliminating these fees, Citi will continue to offer a robust suite of free overdraft protection services for our consumers. Citi does not track whether account holders were formerly unbanked/underbanked. • Serving Our Customers and Clients Responsibly > Treating Customers Fairly • Access Account webpage • Citi retail banking overdraft fees elimination
	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Quantitative	FN-CB-240a.4	We do not track the number of participants in financial literacy initiatives, but examples of our efforts with underbanked communities are below. • Strategic Philanthropy: The Citi Foundation • Citi Volunteers Around The World
Incorporation of Environmental, Social, and Governance Factors in Credit Analysis	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Discussion and Analysis	FN-CB-410a.2	• Risk Management > Environmental and Social Risk Management • Environmental and Social Policy Framework • 2025 10-K page 116 • 2024 Citi Climate Report pages 26-29

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	Quantitative	FN-CB-410b.1	• 2024 Citi Climate Report pages 34- 36
	Gross exposure for each industry by asset class	Quantitative	FN-CB-410b.2	Citi discloses committed exposure for 10 sector portfolios. • 2024 Citi Climate Report pages 34-36
	Percentage of gross exposure included in the financed emissions calculation	Quantitative	FN-CB-410b.3	Citi does not report this information.
	Description of the methodology used to calculate financed emissions	Discussion and Analysis	FN-CB-410b.4	• Net Zero Metrics Methodology
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Quantitative	FN-CB-510a.1	Citigroup is a public company and, as such, files periodic and current reports with the U.S. Securities and Exchange Commission ("SEC"), as required by the Securities Exchange Act of 1934. The reports include current descriptions of material regulatory proceedings, investigations and litigation. Copies of Citigroup's periodic and current reports are on file with the SEC and available at www.sec.gov. • 2025 10-K pages 287-293
	Description of whistleblower policies and procedures	Discussion and Analysis	FN-CB-510a.2	• Ethics at Citi > Escalating Concerns • Human Rights > Respecting Human Rights in Our Financing Decisions • Citi Code of Conduct page 10
Systemic Risk Management	Global Systemically Important Bank (G-SIB) score, by category	Quantitative	FN-CB-550a.1	• 2025 10-K pages 38-39 • Office of Financial Research — Bank Systemic Risk Monitor
	Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Discussion and Analysis	FN-CB-550a.2	• 2025 10-K pages 39-40
Activity Metric	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Quantitative	FN-CB-000.A	Citi does not report this information.
	(1) Number and (2) value of loans by segment: (a) personal, (b) small business and (c) corporate	Quantitative	FN-CB-000.B	Citi discloses the value of outstanding consumer and corporate loans in our 10-K. • 2025 10-K pages 83-85

Consumer Finance

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Customer Privacy	Number of account holders whose information is used for secondary purposes	Quantitative	FN-CF-220a.1	Citi does not report this information.
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Quantitative	FN-CF-220a.2	See response to FN-CB-510a.1.
Data Security	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected	Quantitative	FN-CF-230a.1	See response to FN-CB-230a.1.
	Card-related fraud losses from (1) card-not-present fraud and (2) card-present and other fraud	Quantitative	FN-CF-230a.2	Citi does not aggregate and publicly disclose losses due to fraud.
	Description of approach to identifying and addressing data security risks	Discussion and Analysis	FN-CF-230a.3	See response to FN-CB-230a.2.
Selling Practices	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold	Quantitative	FN-CF-270a.1	Citi does not track this information.
	Approval rate for (1) credit and (2) pre-paid products for applicants	Quantitative	FN-CF-270a.2	Citi does not report this information.
	(1) Average fees from add-on products, (2) average APR of credit products, (3) average age of credit products, (4) average number of credit accounts, and (5) average annual fees for pre-paid products	Quantitative	FN-CF-270a.3	Citi does not track this information.
	(1) Number of customer complaints filed, (2) percentage with monetary or nonmonetary relief	Quantitative	FN-CF-270a.4	Citi does not report this information.
	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	Quantitative	FN-CF-270a.5	See response to FN-CB-510a.1.
Activity Metric	Number of unique consumers with an active (1) credit card account and (2) pre-paid debit card account	Quantitative	FN-CF-000.A	Citi discloses the number of new retail banking and credit card account acquisitions. Citi does not disaggregate credit card and prepaid debit card accounts nor report unique consumers. • 4Q25 Quarterly Financial Data Supplement page 10
	Number of (1) credit card accounts and (2) pre-paid debit card accounts	Quantitative	FN-CF-000.B	Citi discloses the number of new retail banking and credit card account acquisitions. Citi does not disaggregate credit card and prepaid debit card accounts. • 4Q25 Quarterly Financial Data Supplement page 10

Investment Banking & Brokerage

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Employee Diversity & Inclusion	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees	Quantitative	FN-IB-330a.1	Citi does not report this information.
Incorporation of ESG Factors in Investment Banking & Brokerage Activities	Revenue from (1) underwriting, (2) advisory, and (3) securitization transactions incorporating integration of environmental, social, and governance (ESG) factors, by industry	Quantitative	FN-IB-410a.1	We do not track revenue associated with the integration of ESG factors, but activity contributing to the $1 Trillion Sustainable Finance Goal is provided in the following section: • Our $1 Trillion Goal
	(1) Number and (2) total value of investments and loans incorporating integration of environmental, social, and governance (ESG) factors, by industry	Quantitative	FN-IB-410a.2	• Our $1 Trillion Goal • Risk Management > Transactions and Client Relationships Screened by ESRM
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment banking and brokerage activities	Discussion and Analysis	FN-IB-410a.3	• Our $1 Trillion Goal • Risk Management > Environmental and Social Risk Management • Environmental and Social Policy Framework
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Quantitative	FN-IB-510a.1	See response to FN-CB-510a.1.
	Description of whistleblower policies and procedures	Discussion and Analysis	FN-IB-510a.2	See response to FN-CB-510a.2.
Professional Integrity	(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Quantitative	FN-IB-510b.1	Citi does not report this information.
	Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party	Quantitative	FN-IB-510b.2	Citi does not report this information.
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	Quantitative	FN-IB-510b.3	See response to FN-CB-510a.1.
	Description of approach to ensuring professional integrity, including duty of care	Discussion and Analysis	FN-IB-510b.4	• Ethics at Citi • Serving Our Customers and Clients Responsibly • Citi Code of Conduct

Topic	Accounting Metric	Category	Code	Report Section or Other Documentation
Systemic Risk Management	Global Systemically Important Bank (G-SIB) score, by category	Quantitative	FN-IB-550a.1	See response to FN-CB-550a.1.
	Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Discussion and Analysis	FN-IB-550a.2	See response to FN-CB-550a.2.
Employee Incentives & Risk Taking	Percentage of total remuneration that is variable for Material Risk Takers (MRTs)	Quantitative	FN-IB-550b.1	We disclose the breakdown of annual compensation for our executive officers in our Proxy Statement. A multi-year variable remuneration program for certain executive officers, called the Transformation Bonus Program, is also disclosed within the Proxy. • 2026 Proxy Statement pages 74-75
	Percentage of variable remuneration of Material Risk Takers (MRTs) to which malus or clawback provisions were applied	Quantitative	FN-IB-550b.2	Citi discloses the applicable policies, triggers and affected forms of remuneration under the clawback provisions in our Proxy Statement. • 2026 Proxy Statement page 93
	Discussion of policies around supervision, control, and validation of traders' pricing of Level 3 assets and liabilities	Discussion and Analysis	FN-IB-550b.3	Citi does not report this information.

<table>
<tr><th>Topic</th><th>Accounting Metric</th><th>Category</th><th>Code</th><th>Report Section or Other Documentation</th></tr>
<tr><td>Activity Metric</td><td>(1) Number and (2) value of (a) underwriting, (b) advisory, and (c) securitization transactions</td><td>Quantitative</td><td>FN-IB-000.A</td><td>Per Dealogic, our transaction volumes for 2025 were:
<table><tr><th>Transaction Type</th><th>Volume ($M)</th><th>Deals (#)</th></tr><tr><td>Underwriting</td><td>$832,498.9</td><td>3,642</td></tr><tr><td>Completed M&A</td><td>$589,310.0</td><td>261</td></tr><tr><td>Securitizations</td><td>$129,292.6</td><td>408</td></tr></table>
• Dealogic press view standards were used to run the league tables.
• Values include Dealogic Rank Eligible transactions only.
• Citi volume for Mergers and Acquisitions is Equal Credit to Target and Acquirer Advisors.
• Citi volume for underwriting is Full to Book Manager, Equal if Joint Books.
• Underwriting is inclusive of equity and equity-linked securities, debt capital markets issuances including securitization of assets and mortgage-backed securities, and syndicated loans.
• Securitizations consist of asset and mortgage-backed securities.
• Derivatives are not accounted for in the table above.</td></tr>
<tr><td></td><td>(1) Number and (2) value of proprietary investments and loans by sector</td><td>Quantitative</td><td>FN-IB-000.B</td><td>We do not disclose all of our proprietary investments. Citi Ventures maintains an active portfolio of over 100 companies across seven fintech and enterprise tech focus areas. The Citi Impact Fund makes equity investments in companies that are addressing societal challenges in the areas of Financial Resilience, Future of Work, Climate Resilience and Social Infrastructure.
• Citi Ventures
• Citi Impact Fund</td></tr>
<tr><td></td><td>(1) Number and (2) value of market making transactions in (a) fixed income, (b) equity, (c) currency, (d) derivatives, and (e) commodity products</td><td>Quantitative</td><td>FN-IB-000.C</td><td>Citi does not report this information.</td></tr>
</table>

United Nations Guiding Principles Reporting Framework Index

The information and disclosures included in this report are guided by the United Nations Guiding Principles Reporting Framework. This reflects our support of the U.N. Guiding Principles on Business and Human Rights and our commitment to transparency and accountability regarding our human rights-related activities and policies. The following table indicates where readers can find information that addresses or is related to issues raised in the framework, in either this report or other publicly available documents.

Section of the Framework			Report Section or Other Documentation
Part A: Governance of Respect for Human Rights			
Policy commitment	A1	What does the company say publicly about its commitment to respect human rights?	• Human Rights > Our Commitment to Respect Human Rights
	A1.1	How has the public commitment been developed?	• Human Rights > Our Commitment to Respect Human Rights
	A1.2	Whose human rights does the public commitment address?	• Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Rights of Indigenous Peoples • Citi Statement on Human Rights
	A1.3	How is the public commitment disseminated?	The following documents, which state our commitment to respect human rights and our expectations about the commitment of others, are posted publicly on Citi's website: • Citi Code of Conduct • Citi Requirements for Suppliers • Citi Statement of Supplier Principles • Citi Statement on Human Rights

Section of the Framework			Report Section or Other Documentation
Embedding respect for human rights	A2	How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?	• Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Human Rights of Our Employees • Human Rights > Respecting Human Rights in Our Financing Decisions
	A2.1	How is day-to-day responsibility for human rights performance organized within the company, and why?	• Governance of Environmental and Social Matters at Citi • Sustainable Operations > Sustainable Sourcing • Risk Management > Safeguarding Data and Protecting Customer Information • Risk Management > Environmental and Social Risk Management • Human Rights
	A2.2	What kinds of human rights issues are discussed by senior management and by the Board, why?	• Risk Management > Environmental and Social Risk Management • Human Rights > Our Salient Human Rights Risks • Human Rights > Respecting Human Rights in Our Financing Decisions • Environmental and Social Policy Framework • Citi Statement on Human Rights
	A2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	• Ethics at Citi > Code of Conduct • Risk Management > Environmental and Social Risk Management • Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Human Rights of Our Employees • Citi Code of Conduct
	A2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	• Risk Management > Environmental and Social Risk Management • Human Rights > Respecting Human Rights in Our Financing Decisions • Sustainable Operations > Sustainable Sourcing • Citi Requirements for Suppliers • Citi Statement of Supplier Principles • Citi Statement on Human Rights
	A2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	While there were no specific lessons of note from the reporting period, we summarized our learnings and changes over the last few years in the overall Human Rights section. We periodically review and update the Statement on Human Rights to reflect the evolution of responsible practices within the industry. • Human Rights

Section of the Framework			Report Section or Other Documentation
Part B: Defining the Focus of Reporting			
Statement of salient issues	B1	State the salient human rights issues associated with the company's activities and business relationships during the reporting period.	• Human Rights > Our Salient Human Rights Risks • Citi Statement on Human Rights
Determination of salient issues	B2	Describe how the salient human rights issues were determined, including any input from stakeholders.	• Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Rights of Indigenous Peoples • Human Rights > Respecting Human Rights in Our Financing Decisions • Citi Statement on Human Rights
Choice of focal geographies	B3	If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.	Not applicable: Citi does not report human rights considerations by geography — our approach is global.
Additional severe impacts	B4	Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.	Not applicable: Citi was not aware of instances of severe human rights impacts that occurred or were still being addressed during the reporting year.
Part C: Management of Salient Human Rights Issues			
Specific policies	C1	Does the company have any specific policies that address its salient human rights issues and, if so, what are they?	As an employer, we have instituted the policies described in our Code of Conduct to promote respectful treatment of our employees. The Citi Requirements for Suppliers and Citi Statement of Supplier Principles communicate our expectation to our suppliers that they identify and seek to prevent practices constituting violations of human rights in the workplace. Beyond our own operations and supply chain, our Global Anti-Money Laundering Program and Know Your Client protocols help support our engagement with and evaluation of clients for risks related to modern slavery and human trafficking. The most severe potential human rights risks posed by our clients' activities, particularly in the context of project-related finance, are identified through the application of our ESRM Policy. • Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Human Rights of Our Employees • Citi Statement on Human Rights
	C1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	• Sustainable Operations > Sustainable Sourcing • Risk Management > Environmental and Social Risk Management • Human Rights > Our Commitment to Respect Human Rights • Human Rights > Respecting the Human Rights of Our Employees • Citi Code of Conduct • Citi Requirements for Suppliers • Citi Statement of Supplier Principles • Citi Statement on Human Rights

Section of the Framework			Report Section or Other Documentation
Stakeholder engagement	C2	What is the company's approach to engagement with stakeholders in relation to each salient human rights issue?	• Human Rights > Respecting Human Rights in Our Financing Decisions • Risk Management >Policy Implementation • Citi Statement on Human Rights
	C2.1	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	• Risk Management >Environmental and Social Risk Management • Human Rights > Respecting the Rights of Indigenous Peoples • Human Rights > Respecting Human Rights in Our Financing Decisions
	C2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	• Sustainability at Citi > Stakeholder Engagement at Citi
	C2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	• Human Rights > Respecting the Rights of Indigenous Peoples • Human Rights > Respecting Human Rights in Our Financing Decisions
Addressing impacts	C3	How does the company identify any changes in the nature of each salient human rights issue over time?	We review and update this Statement periodically to reflect the evolution of responsible practices within the industry. We engage with a diverse array of stakeholders on issues related to human rights and report on our progress in our annual sustainability-related reporting. • Citi Statement on Human Rights
	C3.1	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	Individual risks do arise, but trends were not identified. Identified risks are reviewed and addressed in keeping with the Citi ESRM Policy. • Human Rights > Respecting Human Rights in Our Financing Decisions • Human Rights > Respecting the Rights of Indigenous Peoples
	C3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	No notable severe human rights impacts were identified. When severe impacts occur, they are managed in keeping with the Citi ESRM Policy.

Section of the Framework			Report Section or Other Documentation
Integrating findings and taking action	C4	How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?	Within our Statement on Human Rights, we indicate how our salient human rights risks are addressed in various areas of our value chain. Those findings are translated into statement and policy updates and embedded in our operations, including how we engage with employees, suppliers, customers and those affected by our clients' operations.
	C4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	• Governance of Environmental and Social Matters at Citi • Risk Management > Environmental and Social Risk Management • Human Rights
	C4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue or other business objectives, how are these tensions addressed?	• Risk Management > Environmental and Social Risk Management • Human Rights > Respecting the Human Rights of Our Employees • Human Rights > Respecting Human Rights in Our Financing Decisions • Human Rights > Respecting the Rights of Indigenous Peoples • Serving Our Customers and Clients Responsibly • Respecting the Rights of Indigenous Peoples
	C4.3	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	• Risk Management > Safeguarding Data and Protecting Customer Information • Human Rights > Respecting Human Rights in Our Financing Decisions
Tracking performance	C5	How does the company know if its efforts to address each salient human rights issue are effective in practice?	Most of Citi's salient human rights risks arise downstream with those potentially affected by our clients' operations. Citi applies our ESRM Policy Areas of High Caution to identify where those risks may arise. The ESRM team conducts further due diligence on the potential risks and reviews the clients' policies and practices, to avoid, minimize and mitigate such risks. When called for, based on the risks identified, we engage our clients to understand the implementation and effectiveness of their policies. Based on the risks identified and the client's actions to avoid, minimize and mitigate such risks, the Citi ESRM team determines whether the transaction or client relationship aligns with the Citi ESRM Policy, and whether ongoing monitoring is required. Citi's annual credit review process provides another opportunity for enhanced due diligence of salient risks. When clients get flagged for risks, the ESRM team may identify the need for ongoing monitoring and/or client engagement to ensure risks are adequately managed. • Sustainability at Citi > Stakeholder Engagement at Citi • Risk Management > Environmental and Social Risk Management • Citi Statement on Human Rights
	C5.1	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	• Human Rights > Respecting Human Rights in Our Financing Decisions

Section of the Framework			Report Section or Other Documentation
Remediation	C6	How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?	• Human Rights > Access to Remedy
	C6.1	Through what means can the company receive complaints or concerns related to each salient issue?	• Ethics at Citi > Escalating Concerns • Human Rights >Respecting Human Rights in Our Financing Decisions • Citi Code of Conduct
	C6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	• Ethics at Citi > Employee Feedback: Ethics at Citi • Sustainability at Citi > Stakeholder Engagement at Citi
	C6.3	How does the company process complaints and assess the effectiveness of outcomes?	• Ethics at Citi > Escalating Concerns • Ethics at Citi > Transparency for Employees • Human Rights > Respecting Human Rights in Our Financing Decisions • Citi Code of Conduct
	C6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	Citi does not disclose information about complaints or related outcomes. We did, however, engage with NGOs and other expert stakeholders during the reporting year to discuss human rights trends and developments. • Ethics at Citi > Acting With Integrity • Risk Management > Policy Implementation • Human Rights > Respecting Human Rights in Our Financing Decisions • Citi Code of Conduct
	C6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	We identified no instances with regard to access to remedy during the reporting period.

Principles for Responsible Banking

The Principles for Responsible Banking (PRB, or the Principles) are a framework for signatory banks to use in aligning their strategy and practice with the United Nations Sustainable Development Goals (SDGs). The Principles encourage a sustainable banking system and help the industry demonstrate how it makes a positive contribution to society. Citi is committed to responsible banking, and we continue our efforts to conduct business in a manner that we believe is consistent with the intent of the Principles.

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
Citi's approach to sustainability centers around activities including sustainable finance, environmental impact and climate risk, strengthening communities, human capital management and responsible business. Many of our sustainable finance activities are compatible with the SDGs.	Citi has not conducted a recent impact analysis assessment. Citi intends to leverage the identification of impacts it may undertake pursuant to any double-materiality assessment requirements to which it may become subject. We have developed a set of measurable goals and commitments related to the topics that we believe are of interest to our business, colleagues, clients and communities. Below, we list commitments related to sustainable finance and environmental impact: **$1 Trillion Sustainable Finance Goal** — Citi has committed to finance and facilitate $1 trillion in sustainable finance by 2030, to help accelerate the transition to a sustainable, low-carbon economy that supports society's environmental, social and economic needs. Transactions must meet specified environmental or social criteria to contribute to this goal. **Net Zero Commitment** — Citi has committed to net zero greenhouse gas (GHG) emissions for our financing by 2050, with interim 2030 emissions reduction targets for 10 priority sectors, as well as net zero GHG emissions for our operations by 2030.	We have established dedicated teams across our businesses to offer strategic sustainable finance services and solutions to our clients. Numerous business groups have bankers or teams focused on advising clients and offering customized sustainable finance products and services. We strive to adhere to high ethical standards, to earn and maintain the public's trust, and to deliver products and services that provide value, clarity and dependability, in line with our Treating Customers Fairly principles. Our centralized Environmental and Social Risk Management (ESRM) team evaluates project-related transactions and clients subject to ESRM Sector-Specific Requirements that trigger review under our ESRM Policy. Further, Citi engages with clients to understand their sustainability-related strategies, including emissions reduction goals if applicable, disclosures and areas that may involve climate-related risks.
Links & references • Page 4, 2025 Sustainability Highlights • Page 3, Environmental and Social Policy Framework	**Links & references** • Pages 11-16, Our $1 Trillion Goal • Page 17, Our Net Zero Commitment	**Links & references** • Pages 5-7, Sustainability at Citi • Pages 41-45, Risk Management • Pages 50-51, Serving Our Customers and Clients Responsibly • Environmental and Social Policy Framework

Principle 4 **Stakeholders**	Principle 5 **Governance & Culture**	Principle 6 **Transparency & Accountability**
Citi believes we are best able to drive business value when serving the interests of a wide array of stakeholders, including clients and customers, communities, employees, governments and regulators, investors, stakeholder groups and NGOs and suppliers. Examples of stakeholder groups and the mechanisms by which we engage with them may be found in the Stakeholder Engagement at Citi section linked below. We are also a member of a number of trade and business associations for various business reasons that, at times, may lobby or engage with policymakers on different issues, including issues and policies that could have impacts on GHG emissions or climate change broadly.	The Nomination, Governance and Public Affairs Committee of the Board oversees and reviews Citi's policies and programs for sustainability, climate change, human rights and community investment, and has reviewed stockholder proposals at a number of meetings. The Risk Management Committee of the Board reviews key risk policies, including those related to climate risk. The Audit Committee has oversight over the controls and procedures related to Citi's group-level sustainability reporting, including both voluntary disclosures and regulatory filings. Our Code of Conduct outlines the standards of ethics and professional behavior expected of employees and representatives of Citi when dealing with clients, business colleagues, shareholders, communities and each other. We provide Code of Conduct training to new hires globally, as well as programs and training on anti-bribery and corruption, anti-money laundering, ESRM and climate risks. Note: Our governance processes provide for oversight of the implementation of our key initiatives and targets. We note that while there is oversight on initiatives that generally align with the goals of the Principles, the Principles themselves are not specifically discussed in review of the issues.	In addition to this Sustainability Report, we publish an annual Climate Report. Citi receives limited third-party assurance for Scope 1 and 2 GHG emissions reporting. Citi also receives limited third-party assurance for all of the assets in Citi's Green Bond Asset Portfolio, Affordable Housing Bond Asset Portfolio and Social Finance Bond Asset Portfolio.
Links & references • Page 7, Stakeholder Engagement at Citi • Pages 22-25, 2024 Citi Climate Report	**Links & references** • Page 6, Governance of Environmental and Social Matters at Citi • Pages 39-40, Ethics at Citi • Pages 41-45, Risk Management • Citi Code of Conduct	**Links & references** • Pages 52-68, Appendices • 2024 Citi Climate Report • 2025 Citi Green and Social Bond Report

Independent Accountants' Review Report

KPMG LLP
Two Manhattan West
375 9th Avenue, 17th Floor
New York, NY 10001

Independent Accountants' Review Report

To the Board of Directors and Management of Citigroup Inc.:

Report on Selected Metrics in the Environmental Metrics for Operations and the related Notes included in the Citigroup Inc. 2025 Sustainability Report

Conclusion

We have reviewed whether certain operational environmental metrics indicated with the symbol "*" and the related notes included on page 23 of Citigroup Inc.'s (the Company's) 2025 Sustainability Report for the year ended December 31, 2025 (the Selected Metrics) have been measured following the guidance in the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) GHG Protocol: A Corporate Accounting Reporting Standard (revised edition) and the guidance in the WRI/WBCSD GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard (the Criteria).

Based on our review, we are not aware of any material modifications that should be made to the Selected Metrics for the year ended December 31, 2025 in order for them to be prepared in accordance with the Criteria.

Our conclusion on the Selected Metrics does not extend to any other information that accompanies or contains the Selected Metrics and our report.

Basis for conclusion

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants in the versions of AT-C section 105, Concepts Common to All Attestation Engagements, and AT-C section 210, Review Engagements that are applicable as of the date of our review. We are required to be independent and to meet our other ethical requirements in accordance with relevant ethical requirements related to the engagement. We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

Responsibilities for the Selected Metrics

Management of Citigroup Inc. is responsible for:

- designing, implementing and maintaining internal control relevant to the preparation of the Selected Metrics such that they are free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the Selected Metrics and appropriately referring to or describing the criteria used; and
- preparing the Selected Metricsin accordance with the Criteria.

Inherent limitations in preparing the Selected Metrics

As described on page 23 of the Company's 2025 Sustainability Report, the Selected Metrics are subject to measurement uncertainties resulting from limitations inherent in nature and the methods used for determining such data. The selection by management of different, but acceptable measurements techniques can result in materially different measurements. The precision of different measurements techniques may also vary.

Our responsibilities

The attestation standards established by the American Institute of Certified Public Accountants require us to:

- plan and perform the review to obtain limited assurance about whether any material modifications should be made to the Selected Metrics in order for it to be prepared in accordance with the Criteria; and
- express a conclusion on the Selected Metrics based on our review.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the Selected Metrics and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, the procedures we performed primarily consisted of:

- inquiring of management to obtain an understanding of the methodologies applied measure and evaluate the Selected Metrics;
- evaluating management's application of the methodologies;
- inspecting supporting documentation for a selection of activity data related to the Selected Metrics;
- considering the appropriateness of emission factors used and estimates;
- recalculating a selection of the greenhouse gas emissions and;
- performing analytical procedures.

The procedures performed in a review vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether the subject matter information is prepared in accordance with the criteria, in all material respects, in order to express an opinion. Because of the limited nature of the engagement, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an examination been performed.

KPMG LLP

New York, New York
July 20, 2026

Forward-Looking Statements

Certain statements in this report are “forward-looking statements” within the meaning of the U.S. Private Securities Litigation Reform Act of 1995. These statements are based on management’s current expectations and are subject to known and unknown risks, uncertainties, changes in circumstances, and assumptions that are difficult to predict and are often beyond our control and inherently uncertain. These statements are not guarantees of future results, occurrences or performance. Actual results and outcomes may differ materially from those included in this report due to a variety of factors, including but not limited to the precautionary statements included in this report as well as the following factors: global socio-demographic and economic trends; climate-related conditions and weather events; energy prices and technological innovations; consumer and client behavior; data limitations and uncertainty; legislative and regulatory changes; potentially conflicting initiatives from certain U.S. federal, state and other governments; and other unforeseen events or conditions. In addition, we may make forward-looking statements in other publicly available documents, and our management may make forward-looking statements orally to analysts, investors, representatives of the media and others. Generally, forward-looking statements are not based on historical facts, but instead represent our and our management's current beliefs regarding future events. Such statements may be identified by words such as “believe,” “expect," “anticipate,” “intend,” “aim,” “estimate,” “continue,” “project,” “predict,” “outlook,” “goal,” “assume,” “focus,” “forecast,” “commit,” “potential,” “target,” “illustrative,” “plans” and similar expressions or future or conditional verbs such as “will,” “should,” “would,” “may” or “could.” However, any statement that is not a statement of historical fact, regardless of whether it uses any of the foregoing words, is a forward-looking statement. Moreover, many of the forward-looking statements in this report, including our commitments, goals and targets set forth herein, are based on assumptions, standards, metrics, measurements, methodologies, data and internal frameworks believed to be reasonable at the time of preparation, but should not be considered guarantees. In particular, assumptions, standards, metrics, methodologies and frameworks for measurement, reporting and analysis of climate continue to evolve, vary across jurisdictions and regulatory bodies, and are the subject of proposed regulatory changes in multiple jurisdictions, which may have a material impact on our future measurement and reporting, as well as the results of the efforts set forth in this report. Additionally, certain information and metrics in these disclosures are reliant on methodologies and third-party information, including data provided by clients, that we do not independently verify and which may continue to evolve. In particular, we note that standards for accounting for and measuring impact and greenhouse gas (GHG) emissions, as well as measuring GHG emissions reductions or avoidance, and how the use of voluntary carbon offsets may feature in GHG accounting, vary, including due to the underlying emissions factors, assumptions or other methodological features. To the extent that such methodologies or the third-party information we use are subsequently determined to be erroneous or otherwise not in keeping with best practices or regulatory requirements, it may affect our disclosures and our reported progress on our emissions reduction goals.

In addition, in certain instances, this report discusses products that the firm hopes will help clients meet their sustainability objectives and references our own goals that we hope will have a positive impact. These statements are not guarantees of future results, positive impacts, occurrences, performance or condition, and actual results may differ materially from those included in this report. Actual results, performance or outcomes may differ materially from those expressed in or implied by any of these forward-looking statements due to a variety of factors, including, among others, legislative and regulatory changes, potentially conflicting initiatives across jurisdictions, increased regulatory action and litigation relating to potential "greenwashing” allegations, the outcome of current and future legal proceedings and regulatory investigations, public policies, engagement with clients, suppliers, investors, government officials and other stakeholders, our ability to gather and verify data regarding environmental impacts, our ability to successfully implement various initiatives throughout the company under expected time frames, the ability of our partners or potential partners as well as their suppliers to successfully implement initiatives and produce or scale new technologies under expected time frames, the compliance of various third parties with our policies and procedures and legal requirements, and other unforeseen events or conditions. You should not place undue reliance on any forward-looking statement.

Other factors that could cause actual results to differ materially from those described in forward-looking statements can be found in this report, in our filings with the SEC, including, without limitation, the Risk Factors section of our 2025 Annual Report on Form 10-K. Precautionary statements included in such filings should be read in conjunction with this document. Any forward-looking statements made by or on behalf of Citi speak only as to the date they are made, and Citi does not undertake to update forward-looking statements to reflect the impact of circumstances or events that arise after the date the forward-looking statements were made. This report contains statements based on hypothetical or severely adverse scenarios and assumptions, and these statements should not necessarily be viewed as being representative of current or actual risk or forecasts of expected risk. While future events discussed in this report may be significant, any significance should not be read as necessarily rising to the level of materiality of the disclosures required under U.S. federal securities laws or other mandatory disclosure requirements.