



## **THE CITIGROUP GLOBAL INDEPENDENT COMPLIANCE RISK MANAGEMENT (ICRM) ANTI-BRIBERY PROGRAM**

Citigroup Inc. ("Citi") is committed to conducting business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the applicable local anti-bribery laws of the countries in which Citi operates.

One of Citi's core principles is its commitment to responsible finance – conduct that is transparent, prudent, and dependable. Citi's ICRM Anti-Bribery Program embodies this principle.

As part of its ICRM Anti-Bribery Program, Citi has implemented written policies, procedures, and internal controls reasonably designed to comply with anti-bribery laws. The ICRM Anti-Bribery Program includes: oversight and governance; a risk assessment process; communication and training; review and pre-approval processes; due diligence on third party relationships, business transactions/deals, and new products; monitoring and confidential reporting; financial controls and record-keeping; and independent testing processes.

Bribery has no place at Citi. Employees are prohibited from offering, soliciting, or accepting bribes and other improper financial advantages:

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

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

Employees who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery laws, regulations, and Citi's anti-bribery and related policies, may be subject to disciplinary action, up to and including termination. Citi reserves the right to terminate immediately any business relationship that violates our high ethical standards and our commitment to responsible finance.

**UPDATED AS OF AUGUST 2017**