

## Citi Anti-Bribery & Corruption Disclosure Questionnaire

(For Non-Employees)

*Please respond as fully and accurately as possible to the questions presented below. Any false or incomplete information, misrepresentation, or material omission may affect any offer to be placed on a Citi assignment. The information you provide will be reviewed, maintained, and used within Citi in connection with your pursuit of an assignment with Citi and in accordance with applicable laws. Completion of this questionnaire does not constitute an offer, nor contract of employment with Citi.*

*Definitions for terminology are included in the Appendix.*

1. **Do you currently hold, or have you held within the last five years, a position as a Senior Government Official (“SGO”) (e.g., a senior-level person in the government or a senior executive of a government – controlled corporation, institution, or charity)?**

Yes

☐

No

☒

**If yes, provide the:**

a. Most recent Job Title:

N/A

b. Name of the government entity:

N/A

c. Dates of Service:

N/A

d. Country/Countries of the government entity:

N/A

(For public international organizations, please indicate the country in which you are/were employed and that the organization is International)

2. **Are you a Referral or Relative of a current Senior Government Official?**

Yes

☐

No

☒

**If yes, provide the:**

a. SGO Name:

N/A

b. Relationship or other connection to the SGO:

N/A

c. SGO’s most recent job title:

N/A

d. Name of the government entity of the SGO:

N/A

e. Dates of the SGO’s service:

N/A

f. Country/Countries of the government  
entity:

N/A

(For public international organizations, please indicate the country in which the SGO is employed and that the organization is International)

3. Are you a Referral of a current Senior Commercial Person ("SCP") (e.g., the Chief Executive Officer, Board of Directors voting member, Chief Financial Officer, Treasurer, investment banker, or an officer managing the investments or transactions for or on behalf of a commercial business organization)?

Yes

☐

No

☒

If yes, provide the:

a. SCP Name:

N/A

b. Relationship or other connection to  
the SCP:

N/A

c. SCP's most recent job title:

N/A

d. Name of the commercial business  
organization of the SCP:

N/A

e. Dates of the SCP's service:

N/A

f. Country/Countries of the commercial  
business organization:

N/A

(For private international organizations, please indicate the country in which the SCP is employed and that the organization is International):

Name:

\_\_\_\_\_

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

## THE CITIGROUP GLOBAL ANTI-BRIBERY & CORRUPTION (AB&C) COMPLIANCE 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 and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the applicable local anti-bribery and corruption 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 AB&C Program embodies this principle.

Citi has in place written policies, procedures, and internal controls reasonably designed to comply with anti-bribery laws (the “Anti-Bribery & Corruption Compliance Program”). The Anti-Bribery & Corruption Compliance Program includes: oversight and governance; a risk assessment process; communication and training; review and pre-approval processes; due diligence on third party relationships; confidential reporting; financial controls and record-keeping; and independent testing processes.

Bribery and corruption have no place at Citi. Personnel are prohibited from offering, requesting, or accepting bribes and other improper financial advantages:

- Personnel 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 and corruption laws and regulations.

Citi reserves the right to immediately terminate any business relationship that violates our high ethical standards and our commitment to responsible finance.

***I have received, read and understand the above Anti-Bribery & Corruption program statement:***

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX: Definitions

**“Senior Commercial Person” or “SCP”:** is a non-Citi employee of a commercial (i.e., non-governmental) business organization who occupies an influential position within a commercial business organization or makes, or has the ability or authority to make, decisions for or on behalf of a commercial business organization in relation to transactions, assets, funds, and/or direction of a commercial business organization in relation to business with Citi.

For purposes of these Procedures, the following individuals are considered to be SCPs:

- Chief Executive Officer (“CEO”), the deputy of the CEO, or a person with a similar level of management responsibilities and authority, of an organization;
- A voting member of the Board of Directors (whether in an executive or non-executive capacity) of an organization; or
- Chief Financial Officer, Treasurer, investment banker, or an officer managing the investments or transactions for or on behalf of a commercial business organization.

**“Senior Government Official” or “SGO”:** is a Government Official or U.S. Public Official who occupies an influential position within a government entity or makes, or has the ability or authority to make, decisions for or on behalf of a government entity in relation to transactions, assets, funds, and/or direction of a government entity in relation to business with Citi.

This does not include a Government Official or U.S. Public Official in a junior or non-managerial position who does not have influence over any business conducted with Citi. Examples of Government Officials and U.S. Public Officials that generally are not considered SGOs include **non-managerial** police officers, firefighters, correctional officers, postal employees, clerical workers, teachers, librarians, and public transportation employees.

**“Government Official”:** is an elected or appointed official, employee or representative of a non-U.S. government entity (which includes the executive, legislative, administrative, military or judicial branches of a government; a political party; or a government-owned, government-controlled or government-funded corporation, institution or charity) at any level, and may include:

- Government regulators and persons acting in an official capacity on behalf of government regulators;
- Employees of self-regulatory organizations for the financial services industry (even if the self-regulatory organization is not government-sponsored);
- Members of a royal family;
- Officials or public office candidates of any political party;
- Officers, directors or employees of organizations with Government Ownership or Control (as defined below), including:

- Sovereign wealth funds;
- Public pension funds; and
- State owned or controlled organizations, such as hospitals, financial institutions, utility companies and other corporations;
- Officers, directors and employees of educational institutions that are established or operated by a federal, state or local government entity; and
- Officials of public international organizations and persons acting in an official capacity for or on behalf of governments or public international organizations, including, but not limited to:
  - The World Health Organization;
  - United Nations development agencies;
  - International Red Cross;
  - International Monetary Fund; and
  - The World Bank Group.

**“Government Ownership or Control”**: means

- That government ownership equals at least 50% of an entity; or
- Even if government ownership is less than 50%, if the government has actual management and control of an entity, irrespective of the government’s ownership percentage.

**“U.S. Public Official”**: means any person holding either elected or appointed office at the U.S. federal, state, or local level, and his/her staff. This includes officials, directors and employees of regulatory organizations, agencies, authorities, commissions and boards, public employees’ pension funds, and educational institutions that are established or operated by a federal, state, or local Government Entity. In many jurisdictions, the definition includes the official’s or employee’s family.

**“Relative”**: means spouses, domestic partners, civil union partners, parents, grandparents, great-grandparents, children, grandchildren, siblings, aunts, uncles, nieces, nephews, cousins, wards, or equivalent relationships, and any person (other than a tenant or domestic help or employee) who shares the person’s household. Relative also includes “in-laws” and “step” in these same relationships.

**“Referral”**: means an individual recommended for employment or Work Experience at Citi.