Citi's mission is to serve as a trusted partner to our clients by responsibly providing financial services that enable growth and economic progress. This includes contributing to collective eradication of modern slavery in all its forms.

Citi UK's[1] Modern Slavery Act Statement 2025 ("statement") is made pursuant to section 54 of the United Kingdom's Modern Slavery Act 2015 ("UK MSA") and covers the financial year from 1st January, 2025, to 31st December, 2025 ("FY2025"). The purpose of this statement is to outline Citi UK's approach to modern slavery risk and actions we are undertaking to address that risk in our business operations and supply chain.

1. Citi's overview

Citi is a pre-eminent banking partner for institutions with cross-border needs, a global leader in wealth management and a valued personal bank in the United States. Citi undertakes business in nearly 180 countries with a physical presence in over 90 countries providing corporations, governments, investors, institutions and individuals with a broad range of financial products and services. Additional information may be found at www.citigroup.com.

Citi has operated in the United Kingdom since 1902 with the opening of IBC's (International Banking Corporation's) London office. Today, the UK provides global financial services across Markets, Banking, Services and Wealth to our clients around the world.

As a global firm, Citi has a large and dispersed supply chain. Further details about Citi's supplier relationships are set out below in Section 3.d, as well as on our Procurement and Third Party Management ("TPM") website (Suppliers).

2. Our approach to addressing modern slavery risks

a. Governance

Respecting human rights is a shared responsibility throughout Citi. Citi UK's business implements and uses policies and governance structures established by its parent, Citigroup Inc. Citigroup Inc.'s Board of Directors provides oversight of Citi's global approach to considering, evaluating, and integrating our response to human rights and other risks throughout the organisation. This oversight is delegated to the Nomination, Governance, and Public Affairs Committee ("NGPAC") of Citigroup Inc.'s Board, which executes the Board's oversight of sustainability matters, including human rights. For more information on the roles and responsibilities of the NGPAC, please see our NGPAC Charter.

Modern slavery risk falls within the scope of oversight of the UK Business Risk and Controls Committee ("UK BRCC") and is managed by Citi UK's executive leadership, with ultimate oversight by the Board of each of Citi's UK legal entities. The UK BRCC provides on-going governance and oversight of modern slavery-related risks and initiatives.

[1] Note that Citi UK consists of Citigroup Global Markets Limited; Citibank, N.A., London Branch; Citibank Europe plc, UK Branch; and, Citigroup Centre 1 Limited. For the purposes of this statement, the aforementioned entities are collectively referred to as "Citi UK." Where global initiatives or procedures exist, we refer to "Citi UK" and Citi's global parent "Citigroup Inc," collectively as "Citi" or "we".

Operationally, Citi's Chief Sustainability Officer ("CSO") leads the Sustainability and Environmental Social Governance ("ESG") team and develops Citi's sustainability strategy, including Citi's approach to human rights in close partnership with Citi's businesses and functions, including Risk Management and Operations. The CSO provides updates to the NGPAC on key issues, trends and results.

Modern slavery risks related to Citi's clients are primarily addressed by three functions: Citi's global Environmental and Social Risk Management ("ESRM"), Anti-Money Laundering ("AML") and TPM:

- The ESRM team within the Sustainability and ESG Team governs the implementation of Citi's ESRM Policy for client transactions with potential environmental and social risks;
- Citi's global AML function within Independent Compliance Risk Management has responsibility throughout the firm for the client and transactional due diligence policy on AML risk, including those related to modern slavery. Businesses use the AML frameworks and policies and associated controls to help manage modern slavery risks; and,
- Modern slavery risks related to Citi's supply chain are managed by Procurement and TPM teams who are responsible for supplier contracting and purchasing, and TPM provides the associated risk governance structure.

To learn more about Citi's values, governance structure and policies on human rights and other social and environmental issues, please visit the Sustainability Reporting section of our global Corporate Governance page. Prior UK Modern Slavery Act statements are included in the Citi UK site UK Modern Slavery Act Statements.

b. Key policies

As a global financial institution, we recognise our responsibility to be aware of the risks of modern slavery within our own organisation and supply chain and take action to contribute to its eradication. Our commitment to supporting the protection and fulfillment of human rights is expressed through a number of policies and documents, which apply to Citi's global operations, including all entities covered by this Statement:

- Citi's Statement on Human Rights, which expresses our support for the protection and fulfillment of human rights, including those in the United Nations' Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (including the fundamental core conventions which encompass elimination of forced and compulsory labour, elimination of discrimination, abolition of the worst forms of child labour, and a safe and healthy working environment;
- Citi's Code of Conduct, which sets forth our values and standards, including those regarding the treatment of our employees, clients, business colleagues and communities; emphasizes the need for an environment of mutual respect; prohibits discrimination and harassment in any form and provides mechanisms, such as our global Ethics Hotline, for addressing concerns from members of our workforce, supply chain participants, or the public;
- Citi's Environmental and Social Policy Framework, which helps us identify, assess, and manage potential environmental and social risks associated with our financing;
- Citi's Statement of Supplier Principles, which communicates our expectations on human rights and labour issues to our suppliers;
- Citi's Requirements for Suppliers, which facilitate compliance by suppliers with Citi policies and expectations in the course of providing services to Citi; and,

- Citi's AML policies and Know Your Client ("KYC") protocols, which are designed to comply with the financial crime laws and regulations applicable to its global operations. These include controls for identifying 'red flags' and financial activity associated with human trafficking.

Citi is also a signatory to the United Nations' Global Compact, whose Ten Principles include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. In addition, Citi seeks to conduct our business consistent with the expectations articulated in the United Nations Guiding Principles on Business and Human Rights ("UN Guiding Principles"), which 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.

For more information on our approach to human rights and our efforts to implement the UN Guiding Principles, see our Statement on Human Rights and the "Human Rights" section of our most recent Sustainability Report.

3. Due diligence and preventative action

As a financial services organisation employing a highly skilled labour force, Citi considers the risk of modern slavery within its direct business operations to be low. However, Citi recognises that, through its supply chain, investments and customers, it can be indirectly exposed to the risk of modern slavery and human trafficking. The processes that are in place to address the potential risks throughout key areas of activities are outlined below.

a. Operations: engagement of workers

At the end of 2025, Citi UK had over 12,000 direct employees. Citi UK adheres to a strong set of policies and procedures, which limit the risk of modern slavery occurring within Citi's hiring and employment practices. Our pre-employment screening process applies to employees whom we recruit, which includes a right to work in the UK check.

Citi UK complies with applicable legislation in relation to employees' wages and working conditions. Employees are encouraged to provide feedback and suggestions for improvement through various channels, including Citi's annual anonymous Voice of the Employee survey. Responses are reviewed by businesses locally and globally, with action plans implemented for areas of improvement. Under the Code of Conduct, every manager is responsible for creating a work environment free of discrimination, harassment, and retaliation. Managers are expected to lead by example and to inspire their teams to conduct business according to the highest standards of ethics and professional behaviour.

Citi UK also engages external supplier personnel for a variety of different business purposes. In this case, such suppliers have the primary responsibility for performing background checks on their personnel and may be asked to validate that screening was performed according to Citi's standards, as outlined in Citi's Requirements for Suppliers. Recruitment and placement agencies used by Citi must comply with Citi's UK third-party requirements, including Citi's Supplier Principles and Requirements for Suppliers.

Both employees and suppliers are expected to report unacceptable conduct, and promptly escalate violations or potential violations of policies, laws, regulations, rules, standards, procedures, or our Code of Conduct.

b. Charitable activities

Citi and the Citi Foundation (a private foundation funded by Citi) are working to help strengthen communities. All Citi Foundation grantees and recipients of Citi-funded charitable contributions are subject to the onboarding, due diligence, and ongoing monitoring requirements of Citi's TPM Framework.

c. Commercial sponsorship activities

Commercial sponsorship activities are subject to a robust evaluation process. All sponsorships are registered via a central Citi repository and are bound by investment approval governance, due diligence review and legal terms review with scaled levels of approvals depending on investment levels. All sponsorships are required to follow the global sponsorship guidelines and UK specific sponsorship agreements will include Modern Slavery language. Oversight for the most strategic and high value sponsorships is provided by a Sponsorship Advisory council.

d. Equity and other investments

Citi UK's businesses hold certain equity and equity-like investments in various entities. The equity shareholding in these investments is typically well below ownership or control of the entities. Therefore, for reporting purposes, those entities do not form part of Citi UK's operations. Due to its nature, the risk of modern slavery occurring within Citi UK's investment entities is low, and there are processes in place to manage this risk.

All proprietary equity and equity-like or other investments are covered by Citi's Equity Investment Policy. Equity investments of USD 5 million or more which may have ESRM risks are also subject to Citi's Environmental and Social Risk Management Policy.

All investments covered by Citi's Equity Investment Policy must be reviewed and approved by the sponsoring business and all relevant control functions, including approval by the relevant governance forum. Where necessary, additional control functions such as ESRM or the Sustainability and ESG teams can be brought into the relevant governance forums to consider modern slavery risk.

e. Supply chain

Citi aims to have a positive impact on people and the economy through our supply chain decisions. We seek to work with suppliers that share our values, and we set high standards for performance, measurement and responsible business practices. Suppliers are expected to adhere to all laws applicable to them and comply with Citi's Requirements for Suppliers, which communicate relevant Citi policies and mandates, including supplier policies and practices designed to prohibit discrimination in the workplace, address the risk of forced labour, trafficked labour and child labour, and enforce working hours, remuneration and benefits in compliance with applicable law.

We communicate our approach to human rights to our suppliers in our Statement of Supplier Principles. Our approach is reinforced by our Corporate Responsibility Questionnaire ("CRQ"). This questionnaire helps Citi determine how potential and current suppliers manage social issues, including human rights and modern slavery. CRQ improves our supplier engagement and evaluation of their operations as requires information on modern slavery and corporate responsibility. Based on a supplier's responses, the CRQ triggers specific follow-up questions indicative of modern slavery practices. They relate to prohibiting the withholding of worker identity documents, prohibiting the use of unscrupulous labour brokers and charging of recruitment fees, provision of detailed contracts in language understood by the worker, and allowing workers freely to cancel their employment upon reasonable notice.

TPM conduct monitoring of adverse and noteworthy news concerning Citi's suppliers in an attempt to proactively identify and evaluate potential modern slavery risks. Citi's Requirements for Suppliers prohibit specific practices that are indicators of forced labour or human trafficking. Suppliers are expected to adopt policies consistent with the Requirements for Suppliers and to affirm that they have received and read the Requirements upon entering into a contract with Citi UK. Since 2017, Citi's master contract templates for supplier activity in the UK includes modern slavery language.

To manage modern slavery risks within the Citi Tower (25 Canada Square - London office) refurbishment project, Citi UK has implemented a two-pillar risk management framework, involving both Citi UK and the principal contractor. Various provisions have been included within the relevant contracts to help mitigate against modern slavery risks throughout the supply chains and operations associated with the project. This is further reinforced by undertaking ongoing due diligence, including initial supplier assessments and ongoing monitoring. Compliance is further verified through periodic external audits that specifically check for adherence to these standards at fourth-party levels of the supply chain.
Furthermore, to ensure worker protection, the principal contractor maintains its own Modern Slavery Policy and provides a confidential, independently-operated 24/7 whistleblowing hotline and online portal. This resource is accessible to all personnel on-site, including subcontractor employees, allowing them to safely and anonymously report any concerns.

f. Clients' activities

Effectively evaluating human rights risks relating to our clients, counterparties and the projects Citi finances is challenging. Citi works diligently to meet this challenge and respect the human rights of the individuals and communities impacted by the clients and projects which are financed. The AML programme, including Citi's KYC protocols and Citi's ESRM Standard, are some of the key processes that help to mitigate the risk of inappropriate use of our services and products by Citi's clients.

AML regime and KYC protocols

Modern slavery is closely associated with money laundering, since human trafficking may create significant profits that are then laundered. AML regimes, including the UK's regime, require financial institutions to conduct client due diligence ("CDD") at the beginning of a commercial relationship, during the process of on-boarding a new client, and then periodically thereafter while a relationship remains in place, especially when material change events occur. CDD can reveal modern slavery risk indicators in one of three areas: 1) through client behaviour; 2) through KYC processes; and 3) during the business relationship, for example through transaction pattern analysis. CDD is performed on all customers in accordance with our global AML Policy. As part of this process, new customers are assessed through a model and assigned a risk rating. Enhanced CDD is performed on customers where Citi determines that the customer presents a high money laundering risk.

A core component of this screening is a search for negative news, which is required reasonably to discern a customer's reputation and/or involvement in any criminal or high risk activities. Citi has created three categories of reputational risk that are classified based on the severity and type of derogatory information concerned. Under Citi's Name Screening Standard, "trafficking of human beings and migrant smuggling, including the trafficking of human organs and sexual exploitation, including sexual exploitation of children and child pornography" are categorised as Category A crimes, the most severe financial crimes. Under the Standard, Citi should not do business with individuals or entities involved in Category A crimes and any client triggered for such risk would need to be escalated for further due diligence and potential approval.

Potential financial red flags have been identified by regulators, law enforcement and other international organisations dedicated to preventing money laundering, terrorist financing and other crimes. While there are no scenarios specifically calibrated exclusively for the detection of modern slavery, to help identify potential risks of modern slavery, Citi applies general detection scenarios designed to identify red flags indicative of any type of illicit activity. Upon detection of activity suggestive of potential human trafficking, AML intelligence units will submit a Suspicious Activity Report to regulators in accordance with local laws and regulations. The investigative unit will also undertake additional post-investigation actions, including recommending exit of client accounts to the relevant Citi business unit.

To advance the financial sector's collective ability to combat money laundering linked to human trafficking and modern slavery more broadly, Citi has participated in and contributed to a number of industry-wide collaborative initiatives, discussions and publications at both the global and local levels with peers, regulators and civil society, led by Citi's Client Review and Investigations Unit ("CRIU"), among others in our Independent Compliance Risk Management function. CRIU conducts investigations that target modern slavery indicators and red flags, globally or in specific regions, focusing on specific types of potential modern slavery activity exposure within the bank.

Environmental and Social Risk Management

Citi's ESRM Policy prohibits Citi from directly financing projects or activities involving forced labour and harmful or exploitative forms of child labour. The ESRM Policy applies throughout the firm to (i) transactions above certain financial thresholds for the financial product type in question where there is an identified use of proceeds directed to a specific physical asset or project; (ii) client relationships covered by sector standards; (iii) client relationships flagged for elevated environmental, social or reputational risks for various reasons, including the ESRM Areas of High Caution.

The ESRM Policy's Areas of High Caution describe risk factors in client activities that can lead to elevated human rights risks that require enhanced due diligence at a client relationship level. Additionally, transactions supporting a project in countries or regions with a history of known human rights abuses relevant to the sector and/or weak enforcement of labour laws, particularly those requiring large migrant labour workforces, would result in ESRM enhanced due diligence on labour rights relevant to the specific project. Such project-related financing includes ESRM review of labour risk management practices such as ethical recruitment practices, prohibitions of identify document retention practices, adequate worker accommodations and appropriate worker grievance mechanisms. These plans, policies and practices are assessed against international labour standards for project-related transactions.

4. Raising concerns

There are multiple channels available to members of Citi UK's workforce, and any third party, to raise concerns relating to modern slavery, including Citi's global Ethics Hotline. Concerns may be reported by employees and contractors anonymously to this Ethics Hotline.

Citi prohibits any form of retaliatory action against anyone who raises concerns or questions in good faith regarding ethics, discrimination, or harassment matters; reports suspected violations of laws, regulation, rule, or breach of policy, standard or procedure, or Citi's Global Code of Conduct; or those who participate in a subsequent investigation of such concerns, or concerns raised through the Ethics Hotline.

5. Our commitment to progress

Citi UK remains committed to improving the way we detect and address modern slavery risks. In 2025, the UK Modern Slavery awareness training was refreshed and assigned as mandatory training to all UK staff. This training has been completed by 99% of staff based in the UK. In addition, ESRM training has been rolled out to targeted UK employees within Markets - Commodities and Spread Products- and Banking.

In 2025, Citi UK strengthened the risk management framework by integrating Modern Slavery–related key words into its media screening processes. Citi UK conducts adverse and noteworthy media screening of suppliers to identify credible allegations or negative reporting linked to modern slavery risks. Any risks identified are promptly assessed and, where appropriate, escalated for further investigation and remediation. This enhanced approach supports ethical sourcing, improves transparency across our supply chain, and reinforces the alignment with applicable regulatory expectations.

6. Approval

This statement has been approved by the boards of directors of Citigroup Global Markets Limited and Citigroup Centre 1 Limited and the executive committees of Citibank, N.A., London Branch, and Citibank Europe plc, UK Branch, each of which will review and update it annually.

Signed by:

Tiina Lee

UK Chief Executive Officer, Citi UK

DATE: 8th June, 2026.